



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant
DATE: July 14, 2009
RE: New NGC d/b/a National Gypsum Co. / 165-27682-00081
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**New NGC d/b/a National Gypsum Co.
75 Ivy Lane
Clinton, Indiana 47842**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

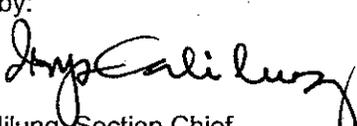
Operation Permit No.: F165-27682-00081	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 14, 2009 Expiration Date: July 14, 2019

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary Concrete Backerboard Plant.

Source Address:	75 Ivy Lane, Clinton, Indiana 47842
Mailing Address:	75 Ivy Lane, Clinton, Indiana 47842
General Source Phone Number:	765-828-0898
SIC Code:	3272
County Location:	Vermillion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Raw Material Silos:

- (1) Two (2) Portland Cement Storage Silos, identified as U1 and U2, constructed in 2005, with a combined maximum capacity of 11,400 lbs/hr; each equipped with one (1) of two (2) cartridge filters for particulate control identified as CE1 and CE2; and each exhausting to stacks identified as S1 and S2, respectively.
- (2) Two (2) Fly Ash Storage Silos, identified as U3 and U4, constructed in 2005 with a combined maximum capacity of 9,800 lbs/hr, equipped with two (2) cartridge filters for particulate control identified as CE3 and CE4, and exhausting to two (2) stacks identified as S3 and S4, respectively.
- (3) Two (2) Aluminate Storage Silos, identified as U5 and U6, constructed in 2005 with a combined maximum capacity of 1,760 lbs/hour, each equipped with one (1) of two (2) cartridge filters for particulate control identified as CE5 and CE6, each exhausting to stacks identified as S5 and S6, respectively.

(b) Raw Material Storage Bins:

- (1) One (1) Portland Cement Bin, identified as U7, constructed in 2005 with a maximum capacity of 11,400 lbs/hr, equipped with a baghouse for particulate control identified as CE7, exhausting to a stack identified as S7.
- (2) One (1) Fly Ash Bin, identified as U8, constructed in 2005 with a maximum capacity of 9,800 lbs/hr, equipped with a baghouse for particulate control identified as CE8, exhausting to a stack identified as S8.
- (3) One (1) Aluminate Bin, identified as U9, constructed in 2005 with maximum capacity of 1,760 lbs/hr, equipped with a baghouse for particulate control identified as CE9, exhausting to a stack identified as S9.

- (c) One (1) Wet End Operations Unit, identified as U10, constructed in 2005, consisting of conveying raw material and mixing it with water to form a slurry to spread and dry into the sheet, with a maximum capacity of 21,000 lbs of board per hour, equipped with a baghouse for particulate control identified as CE10, located inside the sand storage room and exhausting through an outside vent, identified as S12.
- (d) One Board Sawing Unit, identified as U11, constructed in 2005 with a maximum capacity of 52 square foot of board sawn per hour, equipped with cartridge filters for particulate control identified as CE11, exhausting to either stack identified as S10 or into the building.
- (e) One (1) Polystyrene Expansion System operating in batch mode, identified as U12, constructed in 2005 with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.
- (f) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with maximum capacity of heat input equal to or less than ten million (10,000,000) British thermal units per hour.
 - (1) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 2005, rated at 3.188 MMBtu/hr
 - (2) Eleven (11) natural gas-fired space heaters, identified as Large Space Heaters, combined capacity of 5.3 MMBtu/hr.
 - (3) Five (5) natural gas-fired space heaters, identified as Small Space Heaters, with combined capacity of 0.5 MMBtu/hr.
 - (4) One (1) natural gas-fired water heater, identified as Water Heater, with maximum capacity of 0.2 MMBtu/hr.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F165-27682-00081, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement
Branch)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F165-27682-00081 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Raw Material Silos:

- (1) Two (2) Portland Cement Storage Silos, identified as U1 and U2, constructed in 2005, with a combined maximum capacity of 11,400 lbs/hr; each equipped with one (1) of two (2) cartridge filters for particulate control identified as CE1 and CE2; and each exhausting to stacks identified as S1 and S2, respectively.
- (2) Two (2) Fly Ash Storage Silos, identified as U3 and U4, constructed in 2005 with a combined maximum capacity of 9,800 lbs/hr, equipped with two (2) cartridge filters for particulate control identified as CE3 and CE4, and exhausting to stacks identified as S3 and S4 respectively.
- (3) Two (2) Aluminate Storage Silos, identified as U5 and U6, constructed in 2005 with a combined maximum capacity of 1,760 lbs/hour, each equipped with one (1) of two (2) cartridge filters for particulate control identified as CE5 and CE6, each exhausting to stacks identified as S5 and S6 respectively.

(b) Raw Material Storage Bins:

- (1) One (1) Portland Cement Bin, identified as U7, constructed in 2005 with a maximum capacity of 11,400 lbs/hr, equipped with a baghouse for particulate control identified as CE7, exhausting to a stack identified as S7.
- (2) One (1) Fly Ash Bin, identified as U8, constructed in 2005 with a maximum capacity of 9,800 lbs/hr, equipped with a baghouse for particulate control identified as CE8, exhausting to a stack identified as S8.
- (3) One (1) Aluminate Bin, identified as U9, constructed in 2005 with maximum capacity of 1,760 lbs/hr, equipped with a baghouse for particulate control identified as CE9, exhausting to a stack identified as S9.

(c) One (1) Wet End Operations Unit, identified as U10, constructed in 2005, consisting of conveying raw material and mixing it with water to form a slurry to spread and dry into the sheet, with a maximum capacity of 21,000 lbs of board per hour, equipped with a baghouse for particulate control identified as CE10, located inside the sand storage room and exhausting through an outside vent, identified as S12.

(d) One Board Sawing Unit, identified as U11, constructed in 2005 with a maximum capacity of 52 square foot of board sawn per hour, equipped with cartridge filters for particulate control identified as CE11, exhausting to either stack identified as S10 or into the building.

(e) One (1) Polystyrene Expansion System operating in batch mode, identified as U12, constructed in 2005 with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11.

(f) One (1) Indoor Sand Storage and Handling System, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate emissions from the source shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.87}$ where: E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

The emissions rate E has been established for the units as follows:

Unit	Process Weight Rate (tons/hour)	Allowable PM Emissions (lbs/hour)
Portland Cement Storage Silo (U1)	2.85	8.27
Portland Cement Storage Silo (U2)	2.85	8.27
Fly Ash Storage Silo (U3)	2.45	7.47
Fly Ash Storage Silo (U4)	2.45	7.47
Aluminate Storage Silo (U5)	0.44	2.40
Aluminate Storage Silo (U6)	0.44	2.40
Portland Cement Bin (U7)	5.70	13.2
Fly Ash Bin (U8)	4.9	11.89
Aluminate Bin (U9)	0.88	3.80
Wet End Operations (U10)	10.5	19.8
Board Sawing Operations (U11)	10.5	19.8
Sand Storage Room (U13)	7.43	15.8

D.1.2 Particulate Matter (PM) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable the PM emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM Limit (lbs/hr)	Control ID
Portland Cement Storage Silo (U1)	0.47	Cartridge Filter (CE1)
Portland Cement Storage Silo (U2)	0.47	Cartridge Filter (CE2)
Fly Ash Storage Silo (U3)	0.47	Cartridge Filter (CE3)
Fly Ash Storage Silo (U4)	0.47	Cartridge Filter (CE4)
Aluminate Storage Silo (U5)	0.47	Cartridge Filter (CE5)
Aluminate Storage Silo (U6)	0.47	Cartridge Filter (CE6)
Portland Cement Bin (U7)	0.47	Baghouse (CE7)
Fly Ash Bin (U8)	0.47	Baghouse (CE8)
Aluminate Bin (U9)	0.47	Baghouse (CE9)
Wet End Operations (U10)	0.57	Baghouse (CE10)
Board Sawing Operations (U11)	0.43	Cartridge Filter (CE11)
Sand Storage Room (U13)	0.02	(High Moisture)
Total	5.26	

Compliance with above conditions shall limit the source-wide PM emissions to less than 250 tons per twelve consecutive month period and shall render 326 IAC 2-7 (Part 70), and 326 IAC 2-2 not applicable.

D.1.3 Particulate Matter (PM₁₀), (PM_{2.5}) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM₁₀ and PM_{2.5} emissions shall not exceed the hourly rates expressed in the following table:

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)	Hourly PM _{2.5} Limit (lbs/hr)	Control ID
Portland Cement Storage Silo (U1)	0.47	0.47	Cartridge Filter (CE1)
Portland Cement Storage Silo (U2)	0.47	0.47	Cartridge Filter (CE2)
Fly Ash Storage Silo (U3)	0.47	0.47	Cartridge Filter (CE3)
Fly Ash Storage Silo (U4)	0.47	0.47	Cartridge Filter (CE4)
Aluminate Storage Silo (U5)	0.47	0.47	Cartridge Filter (CE5)
Aluminate Storage Silo (U6)	0.47	0.47	Cartridge Filter (CE6)
Portland Cement Bin (U7)	0.47	0.47	Baghouse (CE7)
Fly Ash Bin (U8)	0.47	0.47	Baghouse (CE8)
Aluminate Bin (U9)	0.47	0.47	Baghouse (CE9)
Wet End Operations (U10)	0.57	0.57	Baghouse (CE10)
Board Sawing Operations (U11)	0.43	0.43	Cartridge Filter (CE11)
Sand Storage Room (U13)	0.02	0.02	(High Moisture)
Total	5.26	5.26	

Compliance with above conditions shall limit the source-wide PM₁₀ and PM_{2.5} emissions to less than 100 tons each per twelve consecutive month period; with compliance determined at the end of each month, respectively. These limits will render 326 IAC 2-7 (Part 70), and 326 IAC 2-2 not applicable.

D.1.4 VOC [326 IAC 8-1-6]

The VOC emissions from one (1) Polystyrene Expansion System, identified as U12 shall not exceed 3.5 % by weight per ton of polystyrene throughput, and the total throughput shall not exceed 700 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to 24.5 tons of VOC per year.

Compliance with above conditions shall limit the source-wide VOC emissions to less than 100 tons per twelve consecutive month period; and render the requirements of 326 IAC 8-1-6 not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Particulate Control

In order to comply with Conditions D.1.1, D.1.2, and D.1.3 particulate from the storage, conveying and manufacturing processes shall be controlled by baghouses/cartridge filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from Stack S1 through S9 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (d) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drop across the cartridge filters and baghouse used in conjunction with the concrete backerboard manufacturing process, at least once per day when any of the processes are in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

- (a) For a single compartment baghouses/cartridge filters controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouses/cartridge filters controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain the following records on a monthly basis:
- (1) The VOC content of the Polystyrene beads used.
 - (2) Feed throughput rate.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack S1 through S9 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain:
- The once per day records of the pressure drop during normal operation. The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with maximum capacity of heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (1) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 2005, rated at 3.188 MMBtu/hr.
 - (2) Eleven (11) natural gas-fired space heaters, identified as Large Space Heaters, combined capacity of 5.3 MMBtu/hr.
 - (3) Five (5) natural gas-fired space heaters, identified as Small Space Heaters, with combined capacity of 0.5 MMBtu/hr.
 - (4) One (1) natural gas-fired water heater, identified as Water Heater, with maximum capacity of 0.2 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 3.188 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per million Btu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: New NGC d/b/a National Gypsum Co.
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
Mailing Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-27682-00081

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: New NGC d/b/a National Gypsum Co.
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
Mailing Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-27682-00081

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: New NGC d/b/a National Gypsum Co.
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
Mailing Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-27682-00081
Facility: One (1) Polystyrene Expansion System (U12)
Parameter: VOC content and Feed throughput
Limit: Less than 70 pounds per ton of throughput and less than 700 tons of beads throughput per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: New NGC d/b/a National Gypsum Co.
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
Mailing Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-27682-00081

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State Operating
Permit (FESOP) Renewal**

Source Description and Location

Source Name:	New NGC, Inc., d/b/a National Gypsum Company
Location:	75 Ivy Lane, Clinton, Indiana, 47842
County:	Vermillion
SIC Code:	3272
Operation Permit No.:	165-27682-00081
Permit Reviewer:	Swarna Prabha

The Office of Air Quality (OAQ) has reviewed a FESOP application from New NGC, Inc., d/b/a National Gypsum Company relating to the stationary Concrete Backerboard Plant, producing concrete backerboard.

Existing Approvals

On March 27, 2009, New NGC, Inc., d/b/a National Gypsum Company submitted an application to the OAQ requesting to renew its operating permit. The source was issued FESOP No. 165-20326-00081, on December 29, 2004. The source has since received the following approval:

Minor Permit Revision No. 165-22382-00081 issued on April 24, 2006;

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

County Attainment Status

The source is located in Vermillion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective October 27, 1997, for the part of Clinton Township that includes sections 15, 16, 21, 27, 28, 33, and 34. Unclassifiable effective November 15, 1990, for the remainder of Vermillion County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(Air Pollution Control Board; 326 IAC 1-4-84; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Vermillion County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Vermillion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Permitted Emission Units and Pollution Control Equipment

This stationary source consists of the following emission units and pollution control devices:

- (a) **Raw Material Silos:**
 - (1) Two (2) Portland Cement Storage Silos, identified as U1 and U2, constructed in 2005, with a combined maximum capacity of 11,400 lbs/hr; each equipped with

one (1) of two (2) cartridge filters for particulate control identified as CE1 and CE2; and each exhausting to stacks identified as S1 and S2, respectively.

- (2) Two (2) Fly Ash Storage Silos, identified as U3 and U4, constructed in 2005 with a combined maximum capacity of 9,800 lbs/hr, equipped with two (2) cartridge filters for particulate control identified as CE3 and CE4, and exhausting to two (2) stacks identified as S3 and S4, respectively.

NOTE: The maximum capacity of the Fly Ash Storage Silos is increased from 5,700 lbs/hr to 9,800 lb/hr during this renewal process. There is no increase in Particulate emissions because emissions are based on maximum Particulate loading at the outlet of the control equipment (0.02 gr/dscf).

- (3) Two (2) Aluminate Storage Silos, identified as U5 and U6, constructed in 2005 with a combined maximum capacity of 1,760 lbs/hour, each equipped with one (1) of two (2) cartridge filters for particulate control identified as CE5 and CE6, each exhausting to stacks identified as S5 and S6, respectively.

(b) Raw Material Storage Bins:

- (1) One (1) Portland Cement Bin, identified as U7, constructed in 2005 with a maximum capacity of 11,400 lbs/hr, equipped with a baghouse for particulate control identified as CE7, exhausting to a stack identified as S7.
- (2) One (1) Fly Ash Bin, identified as U8, constructed in 2005 with a maximum capacity of 9,800 lbs/hr, equipped with a baghouse for particulate control identified as CE8, exhausting to a stack identified as S8.

NOTE: The maximum capacity of the Fly Ash Bin is increased from 5,700 lbs/hr to 9,800 lb/hr during this renewal process. There is no increase in Particulate emissions because emissions are based on maximum Particulate loading at the outlet of the control equipment (0.02 gr/dscf).

- (3) One (1) Aluminate Bin, identified as U9, constructed in 2005 with maximum capacity of 1,760 lbs/hr, equipped with a baghouse for particulate control identified as CE9, exhausting to a stack identified as S9.

- (c) One (1) Wet End Operations Unit, identified as U10, constructed in 2005, consisting of conveying raw material and mixing it with water to form a slurry to spread and dry into the sheet, with a maximum capacity of 21,000 lbs of board per hour, equipped with a baghouse for particulate control identified as CE10, located inside the sand storage room and exhausting through an outside vent, identified as S12.

- (d) One Board Sawing Unit, identified as U11, constructed in 2005 with a maximum capacity of 52 square foot of board sawn per hour, equipped with cartridge filters for particulate control identified as CE11, exhausting to either stack identified as S10 or into the building.

NOTE: The description of the control equipment listed as baghouse is changed to cartridge filters for Board Sawing Unit (U11). The cartridge filters function in the same capacity as the baghouse, and has equivalent control efficiency. There is no change in the emission rate because the emissions are based on the grain loading (0.02 gr/dscf).

- (e) One (1) Polystyrene Expansion System operating in batch mode, identified as U12, constructed in 2005 with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.

- (f) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (g) Natural gas-fired combustion sources with maximum capacity of heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (1) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 2005, rated at 3.188 MMBtu/hr.
 - (2) Eleven (11) natural gas-fired space heaters, identified as Large Space Heaters, combined capacity of 5.3 MMBtu/hr.
 - (3) Five (5) natural gas-fired space heaters, identified as Small Space Heaters, with combined capacity of 0.5 MMBtu/hr.
 - (4) One (1) natural gas-fired water heater, identified as Water Heater, with maximum capacity of 0.2 MMBtu/hr.

NOTE: No new unit was added or removed during this renewal process.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations

Unrestricted Potential Emissions

The following table reflects the unlimited potential to emit (PTE) to emit of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Emissions (tons/year)
PM	2296
PM10 ⁽¹⁾	2296
PM2.5 ⁽¹⁾	2296
SO ₂	0.023
VOC	67.82
CO	3.21
NO _x	3.82
HAPs	Less than 25

⁽¹⁾ Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1 (29)) of PM, PM10 and PM2.5 is greater than one hundred (250) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC2-7. However, the source has agreed to limit their PM, PM10 and PM2.5 to less than Title V levels, therefore the source will be issued a FESOP renewal.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of all HAP is less than twenty-five (25) tons per year, therefore the source will be issued a FESOP renewal.

PTE of the Entire Source After Issuance of the EFSOP

The source has opted to remain a FESOP source. The table below summarizes the potential to emit of the entire source, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control.

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Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Single HAP	Combined HAPs
Portland Cement Storage Silo - U1	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Portland Cement Storage Silo - U2	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Fly Ash Storage Silo - U3	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Fly Ash Storage Silo - U4	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Aluminate Storage Silo - U5	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Aluminate Storage Silo - U6	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Portland Cement Bin - U7	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Fly Ash Bin - U8	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Aluminate Bin - U9	2.06 ⁽¹⁾	2.06 ⁽¹⁾	2.06 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Conveying/ Mixing unit U10	2.52 ⁽¹⁾	2.52 ⁽¹⁾	2.52 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Board Sawing unit - U11	1.88 ⁽¹⁾	1.88 ⁽¹⁾	1.88 ⁽¹⁾	neg.	neg.	neg.	neg.	neg.	neg.
Polystyrene Expansion System - U12	neg.	neg.	neg.	neg.	neg.	24.50 ⁽²⁾	neg.	neg.	neg.
Sand Storage Room - U13	0.09	0.09	0.09	neg.	neg.	neg.	neg.	neg.	neg.
Insignificant Activities-Boiler and Space heaters	0.07	0.29	0.29	.0229	3.82	0.21	3.21	0.069 (Hexane)	0.07
Total Emissions	23.10	23.32	23.32	0.23	3.82	24.71	3.21	0.069	<25
Part 70 Major Source Threshold	N/A	100	100	100	100	100	100	10	25
PSD Major Source Threshold	250	250	250	250	250	250	250	N/A	N/A

PTE after Production Limitation.

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

There is no PM2.5 Emission Factor in AP42, PM10 = PM2.5

Emission limits are to comply with 326 IAC 2-8-4 requirements.

⁽¹⁾ PM Emissions based on outlet grain loading and at maximum flow rate @ 8760 hrs/ yr. after controls and to comply with 326 IAC 2-8-4.

⁽²⁾ Emissions after FESOP Limits for VOC to render the requirements of 326 IAC 8-1-6 not applicable.

(a) FESOP Status [326 IAC 2-8-4]

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR

63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

The following emission units shall have their PM₁₀ and PM_{2.5} emissions limited such that they shall not exceed the hourly PM₁₀ and PM_{2.5} emission limits specified in the following table:

Unit ID	Hourly PM ₁₀ Limit (lbs/hr)	PM ₁₀ Limit Tons/yr	Hourly PM _{2.5} Limit (lbs/hr)	PM _{2.5} Limit Tons/yr	Control ID
Portland Cement Storage Silo (U1)	0.47	2.06	0.47	2.06	Cartridge Filter (CE1)
Portland Cement Storage Silo (U2)	0.47	2.06	0.47	2.06	Cartridge Filter (CE2)
Fly Ash Storage Silo (U3)	0.47	2.06	0.47	2.06	Cartridge Filter (CE3)
Fly Ash Storage Silo (U4)	0.47	2.06	0.47	2.06	Cartridge Filter (CE4)
Aluminate Storage Silo (U5)	0.47	2.06	0.47	2.06	Cartridge Filter (CE5)
Aluminate Storage Silo (U6)	0.47	2.06	0.47	2.06	Cartridge Filter (CE6)
Portland Cement Bin (U7)	0.47	2.06	0.47	2.06	Baghouse (CE7)
Fly Ash Bin (U8)	0.47	2.06	0.47	2.06	Baghouse (CE8)
Aluminate Bin (U9)	0.47	2.06	0.47	2.06	Baghouse (CE9)
Conveying/Mixing unit (U10)	0.57	2.52	0.57	2.52	Baghouse (CE10)
Board Sawing Operations (U11)	0.43	1.88	0.43	1.88	Cartridge Filter (CE10)
Sand Storage Room (U13)	0.02	0.088	0.02	0.088	(High Moisture)
Total	5.26	23.03	5.26	23.03	

Compliance with these limits from all other emission units at this source, shall limit the source-wide PM₁₀ and PM_{2.5} emissions to less than 100 tons each per 12 consecutive month period; with compliance determined at the end of each month, respectively. These limits will render 326 IAC 2-7 (Part 70), and 326 IAC 2-2 not applicable.

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- (b) PSD Minor Limits [326 IAC 2-2]
 (1) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source has chosen to limit the source wide emissions of PM to less than 250 tons per twelve (12) consecutive month period.

Unit ID	Hourly PM Limit (lbs/hr)	PM Limit Tons/yr	Control ID
Portland Cement Storage Silo (U1)	0.47	2.06	Cartridge Filter (CE1)
Portland Cement Storage Silo (U2)	0.47	2.06	Cartridge Filter (CE2)
Fly Ash Storage Silo (U3)	0.47	2.06	Cartridge Filter (CE3)
Fly Ash Storage Silo (U4)	0.47	2.06	Cartridge Filter (CE4)
Aluminate Storage Silo (U5)	0.47	2.06	Cartridge Filter (CE5)
Aluminate Storage Silo (U6)	0.47	2.06	Cartridge Filter (CE6)
Portland Cement Bin (U7)	0.47	2.06	Baghouse (CE7)
Fly Ash Bin (U8)	0.47	2.06	Baghouse (CE8)
Aluminate Bin (U9)	0.47	2.06	Baghouse (CE9)
Conveying/Mixing unit (U10)	0.57	2.52	Baghouse (CE10)
Board Sawing Operations (U11)	0.43	1.88	Cartridge Filter (CE10)
Sand Storage Room (U13)	0.02	0.088	(High Moisture)
Total	5.26	23.03	

Compliance with these limits from all other emission units at this source, shall limit the source-wide PM emissions to less than 250 tons per twelve consecutive month period; with compliance determined at the end of each month. These limits will render 326 IAC 2-7 (Part 70), and 326 IAC 2-2 not applicable.

- (2) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the source has chosen to limit the source wide emissions of PM₁₀, and PM_{2.5} to less than 100 tons per twelve (12) consecutive month period each.

NOTE: These limits are same as specified in FESOP Permit No. 165-20326-00081.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The one (1) natural gas-fired process boiler, installed in 2005, rated less than 10 MMBtu per hour, the requirements of 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is CoMMenced After August 17, 1971), Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units), and Dc (Standards of Performance for Small Industrial-CoMMercial-Institutional Steam Generating Units) are not included in this permit, because the boiler has a heat input capacity less than 10 MMBtu per hour.
- (c) This source is not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants), (40 CFR Part 60.670-60-676). This rule applies to affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, and bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size

of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart. This plant does not meet the definition of a non-metallic Mineral Processing plant per 40 CFR 60.670, and there is no crusher or dryer therefore, is not subject to this rule.

- (d) This source is not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries), (40 CFR Part 60.730-60.737). This rule applies to each calciner and dryer at a mineral processing plant. This plant does not meet the definition of mineral processing plant.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP status above.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

Pursuant to 326 IAC 2-4.1, this renewal to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP renewal Section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Pursuant to 326 IAC 2-4.1, this source is not subject to this rule, since the unlimited potential to emit of HAPs from the entire source are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Clinton County.

(a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this source is not subject to the requirements of 326 IAC 6-5.

(b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads and parking lots are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability - Raw Material Silos - U1 through U6, raw material storage Bins - U7 through S9, Wet End Operations - U10 and U11, and indoor Sand Storage System - U13

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions from Manufacturing Processes), the particulate emissions from the emissions units described below shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The emissions rate E has been established for the units as follows:

Unit	Process Weight Rate (tons/hour)	Allowable PM Emissions (lbs/hour)
Portland Cement Storage Silo (U1)	2.85	8.27
Portland Cement Storage Silo (U2)	2.85	8.27
Fly Ash Storage Silo (U3)	2.45	7.47
Fly Ash Storage Silo (U4)	2.45	7.47
Aluminate Storage Silo (U5)	0.44	2.40
Aluminate Storage Silo (U6)	0.44	2.40
Portland Cement Bin (U7)	5.70	13.2
Fly Ash Bin (U8)	4.9	11.89
Aluminate Bin (U9)	0.88	3.80
Wet End Operations (U10)	10.5	19.8
Board Sawing Operations (U11)	10.5	19.8
Sand Storage Room (U13)	7.43	15.87

The cartridge filters/baghouses shall be in operation at all times the above emission units are in operation, in order to comply with this rule.

State Rule Applicability - Polystyrene Expansion System - U12

326 IAC 8-1-6 (New Facilities; General Reduction Requirement)

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirement) the VOC emissions from one (1) Polystyrene Expansion System, identified as U12, shall not exceed 3.5 percent of VOC per ton of throughput, and the total throughput shall not exceed 700 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to 24.5 tons of VOC per year.

Compliance with this limit renders the provisions of 326 IAC 8-1-6 not applicable.

NOTE: These limits are same as FESOP Permit No. 165-20326-00081

State Rule Applicability – Insignificant Activites

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 3.188 MMBtu per hour heat input boiler shall be limited to (0.806) pounds per MMBtu heat input.

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of PM emitted per million Btu per hour (MMBtu/hr) Heat input
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

Pursuant to 326 IAC 6-2-4, for Q less than ten (10) million Btu/hr, Pt shall not exceed 0.6 lb/MMBtu. The source will be in compliance with this PM limit by limiting the boiler emission to less than 0.6 lb per MMBtu heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.6, the boilers are not subject to this rule because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Storage Silos, Bins, Wet End Operations Unit, and Board Sawing Unit have applicable compliance determination/monitoring conditions as specified below:

Emission Unit/Control device	Operating Parameters	Frequency	Range	Excursions and Exceedances
Storage Silos (U1 through U6), Bins (U7 through U9), Wet End Operations (U10), Board Sawing (U11) –Cartridge filters and baghouses	Water Pressure Drop	Daily	0.5 and 6.0 inches of water	Response Steps
	Visible Emissions		Normal-Abnormal	

- (c) There are no specific testing requirements applicable because silos are equipped with cartridge filters to control particulates.

Conclusion and Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 27, 2009.

The operation of this Concrete Backerboard manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 165-27682-00081.

**Appendix A: Emissions Calculations
Emission Summary**

TSD Appendix A: Page 1 of 5

Company Name: New NGC, Inc. d/b/a National Gypsum Company

Address: 75 Ivy Lane, Clinton, Indiana 47842

FESOP Renewal No.: 165-27682-00081

Reviewer: Swarna Prabha

Uncontrolled Potential Emissions (tons/year)							
Category	Pollutant	Storage Silos and Bins- U1, U2, U3,U4,U5, U6, U7, U8, U9, (Sand Storage Room-U13)	Conveying/Mixing U10	Board Sawing U11	Insignificant Activities-Boiler and Space heaters	Polystyrene Expansion System (U12)	TOTAL
	PM10	1856.41	251.54	187.71	0.29	-	2295.95
	PM2.5	1856.41	251.54	187.71	0.29	-	2295.95
	SO2	-	-	-	2.29E-02	-	2.29E-02
	NOx	-	-	-	3.82	-	3.82
	VOC	-	-	-	0.21	67.61	67.82
	CO	-	-	-	3.21	-	3.21
Hazardous Air Pollutant	Manganese				1.45E-05		1.45E-05
	Nickel				8.03E-05		8.03E-05
	Toluene				1.30E-04		1.30E-04
	Benzene				8.03E-05		8.03E-05
	Hexane				6.88E-02		6.88E-02
	Formaldehyde				2.87E-03		2.87E-03
	Lead				1.91E-05		1.91E-05
	Chromium				5.35E-05		5.35E-05
	Dichlorobenzene				4.59E-05		4.59E-05
	Totals				7.2E-02		0.07

Controlled Potential Emissions (tons/year)							
Category	Pollutant	Storage Silos and Bins- U1, U2, U3,U4,U5, U6, U7, U8, U9, (Sand Storage Room-U13)	Conveying/Mixing U10	Board Sawing U11	Insignificant Activities-Boiler and Space heaters	Polystyrene Expansion System (U12)	TOTAL
	PM10	18.63	2.52	1.88	0.29	-	23.31
	PM2.5	18.63	2.52	1.88	0.29	-	23.31
	SO2	-	-	-	2.29E-02	-	2.29E-02
	NOx	-	-	-	3.82	-	3.82
	VOC*	-	-	-	0.21	24.50	24.71
	CO	-	-	-	3.21	-	3.21
Hazardous Air Pollutant	Manganese				1.45E-05		0.00
	Nickel				1.86E-06		1.86E-06
	Toluene				1.03E-05		1.03E-05
	Benzene				8.03E-05		8.03E-05
	Hexane				6.88E-02		6.88E-02
	Formaldehyde				2.87E-03		2.87E-03
	Lead				1.91E-05		1.91E-05
	Chromium				5.35E-05		5.35E-05
	Dichlorobenzene				4.59E-05		4.59E-05
	Totals				7.19E-02		0.07

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

NOTES: 1. Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. There is no emission factor for PM2.5 in AP42, therefore PM2.5 = PM10

2. *VOC Emission Limits from Polystyrene Expansion system are based on permit EFSOP # F165-20326-00081 limited throughput

Company Name: New NSC, Inc. d/b/a National Gypsum Company
Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Renewal No.: 165-27682-00081
Reviewer: Swarna Prabha

Emission Unit / Description	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (g/dscf)	Controlled PTE of PM ₁₀ Emissions (lb/hr)	Annual Material Stored (tons)	Controlled PTE of PM ₁₀ Emissions (tpy)	PTE of PM ₁₀ Emissions (lb/hr)	PTE of PM ₁₀ Emissions (tpy)
U1 / Portland Cement Silo 1	8760	2747	0.02	0.47		2.06	47.09	206.26
U2 / Portland Cement Silo 2	8760	2747	0.02	0.47	50000	2.06	47.09	206.26
U3 / Portland Cement Silo 3	8760	2747	0.02	0.47		2.06	47.09	206.26
U4 / Fly Ash Silo	8760	2747	0.02	0.47	28000	2.06	47.09	206.26
U5 / Aluminate Silo #1	8760	2747	0.02	0.47	7800	2.06	47.09	206.26
U6 / Aluminate Silo #2	8760	2747	0.02	0.47		2.06	47.09	206.26
U7 / Portland Cement Bin	8760	2747	0.02	0.47	50000	2.06	47.09	206.26
U8 / Fly Ash Bin	8760	2747	0.02	0.47	25000	2.06	47.09	206.26
U9 / Aluminate Bin	8760	2747	0.02	0.47	7800	2.06	47.09	206.26
					18.56			1856.34

Emission Unit / Description	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (g/dscf)	Controlled PTE of PM ₁₀ Emissions (lb/hr)	Annual Material Mixed (tons)	Controlled PTE of PM ₁₀ Emissions (tpy)	PTE of PM ₁₀ Emissions (lb/hr)	PTE of PM ₁₀ Emissions (tpy)
U10 / Conveying/Mixing	8760	3350	0.02	0.57	88200	2.52	57.43	251.54

Emission Unit / Description	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (g/dscf)	Controlled PTE of PM ₁₀ Emissions (lb/hr)	Annual Material Sawm (sq. ft)	Controlled PTE of PM ₁₀ Emissions (tpy)	PTE of PM ₁₀ Emissions (lb/hr)	PTE of PM ₁₀ Emissions (tpy)
U11 / Board Sawing	8760	2500	0.02	0.43	455220*	1.88	42.86	187.71

Emission Unit / Description	Annual Operating Hours	Operating Flow Rate (lb/hr)	1 Emission Factor	PTE of PM ₁₀ Emissions (lb/hr)	Annual Material Stored (tons)	PTE of PM ₁₀ Emissions (tpy)
U13 / Sand Storage Room	8760	14,860	0.0021	0.016	65087	0.07

Total Potential PM Emissions	Controlled PTE of PM Emissions (lb/hr)	Controlled PTE of PM Emissions (tpy)
	5.26	23.02

There is no emission factor for PM2.5 in AP42, PM10 = PM2.5
PM10 Emissions are equivalent to PM emissions
*Emission Factors from AP 42, Chapter 11.12-2, SCC #3-05-011-05.22.24
* Area of the board per hour sawn is 52 sq foot.

Methodology

Controlled PTE of PM₁₀ Emissions (lb/hr) = Operating Flow Rate (scfm) * Grain Loading (g/dscf) * lb/7000 Grain * 60 min/hr
Controlled PTE of PM₁₀ Emissions (tpy) = Controlled PTE of PM₁₀ Emissions (lb/hr) * ton/2000 lbs * 8760 hrs/yr
PTE of PM₁₀ Emissions (lb/hr) = Controlled PTE of PM₁₀ Emissions (lb/hr) / (1-efficiency), where control efficiency is equal to or greater than 99%
PTE of PM₁₀ Emissions (tpy) = Controlled PTE of PM₁₀ Emissions (lb/hr) / (1-efficiency), where the control efficiency is equal to or greater than 99%

Appendix A: Emissions Calculations
 One (1) Polystyrene Expansion System

Company Name: New NGC, Inc. d/b/a National Gypsum Company
 Address: 75 Ivy Lane, Clinton, Indiana 47842
 FESOP Renewal No.: 165-27682-00081
 Reviewer: Swarna Prabha

Unlimited PTE of VOC (tons/year)		Limited PTE of VOC (tons/year)	
Weight of bag (lbs/batch) =	2,205		
Process time (hours/hour-bag) =	5.00		
Maximum Operating Hours (hours/year) =	8,760		
Maximum Throughput Rate (lbs/year) =	3,863,160	Limited Throughput Rate (tons/year) =	700
VOC/Polystyrene Pentane Weight % =	3.50%	VOC/Polystyrene Pentane Weight % =	3.50%
Unlimited PTE of VOC/Pentane (tons/year) =	67.6	Limited PTE of VOC/Pentane (tons/year)	24.5

Assume all VOC emissions are equal to Pentane emissions

The Permittee operates the polystyrene expansion system in batch mode and it takes 5 hours of process time (utilizing 2,205 pounds bag per batch) from start of a batch to the start of the next batch.

Weight % VOC per ton of Polystyrene material processed = 3.5 % based on MSDS sheet provided by the source.

METHODOLOGY

Unlimited PTE of VOC (tons/year):

Maximum Throughput Rate (lbs/year) = Weight of Bag (lbs/batch) * 1 Batch/ 5 hours * 8760 hours/year

Unlimited PTE of VOC/Pentane (tons/year) = Maximum Throughput Rate (lbs/year) * Weight % VOC/Polystyrene Pentane * 1 ton/2000 lbs

Limited PTE of VOC (tons/year):

Limited PTE of VOC/Pentane (tons/year) = Limited Throughput Rate (tons/year) * Weight % VOC/Polystyrene Pentane

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR <100
Insignificant Activities
Emissions**

**Company Name: New NGC, Inc. d/b/a National Gypsum Company
Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Renewal No.: 165-27682-00081
Reviewer: Swarna Prabha**

Heat Input Capacity	MMBTu/hr
Boiler #1	3.2
Large Space Heaters	5.3
Small Space Heaters	0.5
Water Heater	0.2

Potential Throughput	MMCF/yr
	26.6
	44.1
	4.2
	1.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100.0 **see below	VOC	CO
	1.9	7.6	0.6		5.5	84.0
Potential Emission in tons/yr						
Boiler	0.025	0.101	0.008	1.330	0.073	1.117
Large Space Heaters	0.042	0.167	0.013	2.203	0.121	1.850
Small Space Heaters	0.004	0.016	0.001	0.209	0.011	0.175
Water Heater	0.002	0.006	0.001	0.083	0.005	0.070
Total Potential Emission (tpy)	0.073	0.291	0.023	3.824	0.210	3.212

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Small Boilers, Uncontrolled = 100

Methodology

All emission factors are based on normal firing.

MMBTu = 1,000,000 Btu

MMCF = 1,050,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBTu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR <100
Insignificant Activities
HAPs Emissions

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Renewal No.: 165-27682-00081
Reviewer: Swarna Prabha

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr					
Boiler	2.79E-05	1.60E-05	9.97E-04	2.39E-02	4.52E-05
Large Space Heaters	4.63E-05	2.64E-05	1.65E-03	3.96E-02	7.49E-05
Small Space Heaters	4.38E-06	2.50E-06	1.56E-04	3.75E-03	7.09E-06
Water Heater	1.75E-06	1.00E-06	6.26E-05	1.50E-03	2.84E-06
Total Potential Emission (tpy)	8.031E-05	4.589E-05	2.868E-03	6.884E-02	1.300E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr					
Boiler	6.65E-06	1.46E-05	1.86E-05	5.05E-06	2.79E-05
Large Space Heaters	1.10E-05	2.42E-05	3.08E-05	8.37E-06	4.63E-05
Small Space Heaters	1.04E-06	2.29E-06	2.92E-06	7.93E-07	4.38E-06
Water Heater	4.17E-07	9.18E-07	1.17E-06	3.17E-07	1.75E-06
Total Potential Emission (tpy)	1.912E-05	4.207E-05	5.354E-05	1.453E-05	8.031E-05

Summary Potential Emissions HAPs (tpy)	
HAPs - Organics	7.196E-02
HAPs - Metals	2.096E-04
Total Potential Emissions HAPs	7.217E-02

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: George Schmalz
New NGC d/b/a National Gypsum Company
75 Ivy Lane
Clinton, IN 47842

DATE: July 14, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP
165-27682-00081

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Tina Berceli-Boyle ARCADIS, Consultant
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 14, 2009

TO: Clinton Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: New NGC Inc d/b/a National Gympsum Company
Permit Number: 165-27682-00081

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 7/14/2009 New NGC Inc. d/b/a National Gypsum Company 165-27682-00081 (Final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		George Schmalz New NGC Inc. d/b/a National Gypsum Company 75 Ivy Lane Clinton IN 47842 (Source CAATS) (CONFIRM DELIVERY)									
2		Clinton City Council and Mayors Office 259 Vine Street Clinton IN 47842 (Local Official)									
3		Vermillion County Health Department 825 S. Main St Clinton IN 47842-2201 (Health Department)									
4		Clinton Public Library 313 S 4th St Clinton IN 47842-2398 (Library)									
5		Vermillion County Commissioners P.O. Box 190 Newport IN 47966 (Local Official)									
6		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)									
7		Tina Berceli-Boyle ARCADIS 2 Executive Drive, Suite 303 Chelmsford MA 01824 (Consultant)									
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