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: September 25, 2009

RE: Carpenter Co. / 039-27979-00086

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTV-PMOD.doc 3/27/08

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Mr. Jay Miller
Carpenter Co.
195 County Road 15 South
Elkhart, IN 46516

Sept. 25, 2009

Re: 039-27979-00086
Significant Permit Modification to
Part 70 No.: T 039-17988-00086

Dear Mr. Miller:

Carpenter Co. was issued a Part 70 Operating Permit Renewal (T 039-17988-00086) on February 28, 2008, for a polyurethane foam production source. A letter requesting changes to this permit was received on May 26, 2009. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The source has proposed to use mold release agents containing volatile organic compounds (VOC) at two (2) closed mold polyurethane foam turnstile production operations currently permitted to use water based mold release agents exclusively. This modification requires 326 IAC 8-1-6 (BACT) limits and corresponding monitoring determination, recordkeeping, and reporting requirements.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit Renewal as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jenny Acker, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Jenny Acker or extension 3-9327, or dial (317) 233-9327.

Sincerely,

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments:
Updated Permit
Technical Support Document

JLA

cc: File – Elkhart County
Elkhart Health Department
U.S. EPA, Region V
Northern Regional Office
Compliance and Enforcement Managers
Compliance Data Section
Permits Administration and Support

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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Carpenter Co.
195 County Road 15 South
Elkhart, Indiana 46516

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T 039-17988-00086	
Issued by: *Original document signed by* Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: February 28, 2008 Expiration Date: February 28, 2013

Administrative Amendment No.: 039-26646-00086, issued on June 20, 2008
Administrative Amendment No.: 039-27308-00086, issued on January 16, 2009
Administrative Amendment No. : 039-27353-00086, issued on May 7, 2009
Significant Permit Modification No.: 039-27852-00086, issued on July 20, 2009

Significant Permit Modification No. : 039-27979-00086	
Issued by: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: Sept. 25, 2009 Expiration Date: February 28, 2013

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Attachments

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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a polyurethane foam production source.

Source Address:	195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address:	P.O. Box 2386, Elkhart, Indiana 46515
General Source Phone Number:	574 - 522 - 2800
SIC Code:	3086, 2899, 2297
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) foam pouring line, identified as EU-01A/B, constructed in 1982, consisting of a mixer, tunnel, foam block cut, and slab room, exhausting through Vents 14, 15 and 16 and Vents b through i, capacity: 60,000 pounds of foam per hour using TDI or MDI.

(b) Four (4) loop slitting process lines, identified as EU-02B, constructed in 1998, including three (3) adhesive stations used to coat polyurethane foam, equipped with high volume low pressure (HVLP) spray applicators and exhausting to Stacks 22 and 22a, capacity: 0.148 gallons of adhesive per set-up with a maximum set-up rate of 30 set-ups per 8 hours, total. This process also includes two (2) ink stamping lines, identified as EU-6.1 and EU-6.2, installed in 2005.

(c) One (1) natural gas-fired boiler, identified as EU-03, constructed in 1992, exhausting to Stack V6, rated at 12.55 million British thermal units per hour.

(d) One (1) bonded foam line, identified as EU-04, constructed in 1990 and modified in 2000, exhausting to Stacks S17 and S18, capacity: 25,000 pounds per hour, consisting of the following equipment:

(1) One (1) foam shredding operation;

(2) One (1) pneumatic conveyer system;

(3) Various storage bins;

(4) One (1) foam dry mixer;

(5) One (1) wet mixer;

(6) One (1) molding unit; and

(7) Various storage operations.

(e) Two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.1 and EU-5.2, constructed in March 1998, equipped with a total of two (2) robotic high volume low pressure (HVLP) spray applicators, exhausting to Vents V27, V28, V29, V34 and V35, capacity:

(1) EU-5.1 and EU-5.2 with solvent based mold release: 37.0 pounds of release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour.

(2) EU-5.1 with water based mold release: 9.8 pounds of release agent per hour, 216 units per hour.

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

(h) The following tanks are grouped into four (4) general categories - Primary Pour Tanks (EU-01), Rebond Tanks, Chemical Blending Tanks, and Mold Tanks (EU-05):

Primary Pour Tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual throughput (gallons)
P1	12,500	10.5	19.5	250	POLYOL	0.00	200,000
P2	12,500	10.5	19.5	3,500	POLYOL	0.00	300,000
P3	12,500	10.5	19.5	3,000	POLYOL	0.00	800,000
P4	12,500	10.5	19.5	3,000	POLYL	0.00	800,000
P5*CA	12,500	10.5	19.5	360	MDI	0.010	800,000
P6*CA	12,500	10.5	19.5	360	MDI	0.00	800,000
P7*CV	12,500	10.5	19.5	6000	PrePoly	0.00	250,000
P8	4,890	8.00	15.0	174	ISO PP	0.010	500,000
P9	12,500	10.5	19.5	5,000	POLYOL	0.00	200,000
P10	12,500	10.5	19.5	5,000	POLYOL	0.00	115,000
P11	12,500	10.5	19.5	6,500	POLYOL	0.00	150,000
P12	12,500	10.5	19.5	6,500	POLYOL	0.00	150,000
P13	11,500	10.5	18.0	410	FR	N/A	120,000
P14	12,000	10.5	18.0	410	FR	0.020	200,000
P15	12,000	10.5	18.0	6,500	POLYOL	0.00	150,000
P16	12,000	10.5	18.0	5,000	POLYOL	0.00	100,000
P17	12,000	10.5	18.0	5,000	POLYOL	0.00	115,000
P18	12,000	10.5	18.0	5,000	POLYOL	0.00	200,000
P19***	12,000	10.5	18.0	174	ISO PP	0.010	700,000
P20	12,000	10.5	18.0	6000	PrePoly	0.00	250,000
P21*CA	12,000	10.5	18.0	174	ISO	0.010	550,000

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual throughput (gallons)
P22*CA	12,000	10.5	18.0	174	ISO	0.010	550,000
P23	12,000	10.5	18.0	3,500	POLYOL	0.00	800,000
P24	12,000	10.5	18.0	3,500	POLYOL	0.00	800,000
P25	12,000	10.5	18.0	3,500	POLYOL	0.00	800,000
P26	12,000	10.5	18.0	3,500	POLYOL	0.00	800,000
P26A	3,000	8.00	8.00	3,500	POLYOL	0.00	200,000
P27	50,000	24	16	174	ISO	0.010	700,000
P28	50,000	24	16	174	ISO	0.010	700,000
P29	50,000	24	16	174	ISO	0.010	700,000
P30	50,000	24	16	174	ISO	0.010	700,000

Notes: * Emission Control Device: conservation vents (CV), Nitrogen Blanket (N2) or Carbon Adsorption bed filters (CA)
** Closed System

Rebond Tank

Fixed Roof Cone Storage Tank	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R2***	4,000	8.00	10.0	174	ISO-PP	0.010	700,000***

Notes: * Emission control device, CV, N2, or CA
** Closed System
ISO-PP - Isocyanate Prepolymer
*** P19 and R2 cascade from one tank to the next for a TOTAL throughput of 700,000 gallons.

Chemical Blending Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8.00	30.5	5,000	POLYOL	0.00	20,000
C2	28,500	12.0	34.0	6,500	POLYOL	0.00	900,000
C3	11,500	8.00	30.5	285	FR	0.200	40,000
C4	11,500	8.00	30.5	410	FR	0.200	40,000
C5	11,500	8.00	30.5	N/A	EMPTY	N/A	0.00
C6	11,500	8.00	30.5	575	POLYOL	0.00	10,000
C7	11,500	8.00	30.5	575	POLYOL	0.00	10,000
C8	11,500	8.00	30.5	700	POLYOL	0.00	20,000
C9	11,500	8.00	30.5	700	POLYOL	0.00	100,000
C10	11,500	8.00	30.5	575	POLYOL	0.00	100,000
C11	28,500	12.0	34.0	360	POLYOL	0.00	150,000
C12	11,500	8.00	30.5	575	POLYOL	0.00	25,000
C13**	11,500	8.00	30.5	5,000	POLYOL	0.00	50,000
C14	11,500	8.00	30.5	5,000	POLYOL	0.00	50,000
C15	11,500	8.00	30.5	5,000	POLYOL	0.00	50,000
C16	11,500	8.00	30.5	575	POLYOL	0.00	100,000 gallons total for C16, C17 and C18 combined
C17	11,500	8.00	30.5	575	POLYOL	0.00	
C18	11,500	8.00	30.5	575	POLYOL	0.00	
C19	28,500	12.0	34.0	360	MDI	0.00	150,000
C20	11,500	8.00	30.5	5,000	POLYOL	0.00	80,000
C21	11,500	8.00	30.5	360	MDI	0.00	200,000
C22	11,500	8.00	30.5	360	MDI	0.00	400,000
C23 externally vented	11,500	8.00	30.5	174	ISO	0.010	120,000

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C24	11,500	8.00	30.5	N/A	POLYOL	N/A	60,000
C25 externally vented	28,500	12.0	34.0	500	EXTENDER	0.100	800,000
C26	11,500	8.00	30.5	5,000	POLYOL	0.00	60,000
C27	11,500	8.00	30.5	3,000	POLYOL	0.00	130,000
C28	11,500	8.00	30.5	360	MDI	0.00	30,000
C29	11,500	8.00	30.5	174	A-PP	0.00	200,000
C30	11,500	8.00	30.5	538	BPOLYOL	0.00	470,000
C31	11,500	8.00	30.5	538	BPOLYOL	0.00	200,000
C32	11,500	8.00	30.5	174	A-PP	0.00	500,000
C33	11,500	8.00	30.5	174	A-PP	0.00	500,000
C34	11,500	8.00	30.5	538	BPOLYOL	0.00	500,000
C35	11,500	8.00	30.5	N/A	EMPTY	N/A	0.00
C36	11,500	8.00	30.5	538	BPOLYOL	0.00	500,000
C37	28,500	12.0	34.0	360	MDI	0.00	150,000
C38**	12,000	9.00	41.0	120.8	ABA	0.00	40,000

Notes: Forane(R) 134, a hydrofluorocarbon, is used as an aerosol propellant in the chemical blending operation.

* Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon adsorption bed filters (CA)

** Closed system

Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD1	8,200	10.0	14.0	195	ISO BLEND	0.010	131,549
MLD2	8,200	10.0	14.0	5,000	BPOLY	0.00	200,000
MLD3	8,200	10.0	14.0	5,000	BPOLY	0.00	100,000
MLD4	7,500	10.0	13.0	5,000	BPOLY	0.00	200,000

Notes: * Emission control device, CV, N2, or CA

** System

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) boiler, identified as B1, constructed in 1982, exhausting to Stack V5, rated at 8.36 million British thermal units per hour. [326 IAC 6-2-3]

(b) The following activities with potential uncontrolled particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day: One (1) Non-Woven Fiber Line, identified as IS-3, constructed in 2003, equipped with dry filters for particulate control, capacity: 2,500 pounds of fibers per hour. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T039-17988-00086, is issued for a fixed term of five (5) 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7] [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 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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, and Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**.**

(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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by the "responsible official" need only referenced by the date of the original report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T039-17988-00086 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit

modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification 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 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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 2-7-5] [326 IAC 2-7-6]

(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 2-7-5][326 IAC 2-7-6]

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Response to Excursions or Exceedances [326 IAC 2 7 5] [326 IAC 2-7-6]

(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.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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.19 General Reporting Requirements [326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.20 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 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Polyurethane Foam Operations

(a) One (1) foam pouring line, identified as EU-01A/B, constructed in 1982, consisting of a mixer, tunnel, foam block cut, and slab room, exhausting through Vents 14, 15 and 16 and Vents b through i, capacity: 60,000 pounds of foam per hour using TDI or MDI.

(b) Four (4) loop slitting process lines, identified as EU-02B, constructed in 1998, including three (3) adhesive stations used to coat polyurethane foam, equipped with high volume low pressure (HVLP) spray applicators and exhausting to Stacks 22 and 22a, capacity: 0.148 gallons of adhesive per set-up with a maximum set-up rate of 30 set-ups per 8 hours, total. This process also includes two (2) ink stamping lines, identified as EU-6.1 and EU-6.2, installed in 2005.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to SPM 039-17958-00086, issued on April 12, 2004, and 326 IAC 8-1-6 (New facilities; General reduction requirements), BACT for the one (1) foam pouring line, identified as EU-01A/B, has been determined to be:

(a) The total VOC emissions from the one (1) foam pouring line shall be limited to less than 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The continued development of non-emitting amine catalysts for replacement of existing emitting catalysts where feasible.

(c) The listed work practice as follows:

Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC emission limitation contained in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) To comply with Condition D.1.1, the VOC limitation is determined by the following equation:

VOC Emissions (tons/year) = (Catalyst Usage (tons) x Flash Off (%)) + (TDI Usage (tons) x Flash Off (%)) + (MDI Usage (tons) x Flash Off (%))

Where: The flash off shall not exceed seventy (70) percent for the catalyst usage in the foam pouring line, identified as EU-01A/B.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1(a). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The amount of raw material used on a monthly basis. Records shall include inline flow meter readings of raw material usages and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month; and

(3) The weight of VOC emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) 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 the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Boiler EU-03

(c) One (1) natural gas-fired boiler, identified as EU-03, constructed in 1992, exhausting to Stack V6, rated at 12.55 million British thermal units per hour.

(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 2-7-5(1)]

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate emissions from EU-03 shall not exceed 0.494 pounds per million British thermal units heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For this unit, Q = 20.91 million British thermal units per hour.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Polyurethane Foam Operations

(d) One (1) bonded foam line, identified as EU-04, constructed in 1990 and modified in 2000, exhausting to Stacks S17 and S18, capacity: 25,000 pounds per hour, consisting of the following equipment:

(1) One (1) foam shredding operation;

(2) One (1) pneumatic conveyer system;

(3) Various storage bins;

(4) One (1) foam dry mixer;

(5) One (1) wet mixer;

(6) One (1) molding unit; and

(7) Various storage operations.

(e) Two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.1 and EU-5.2, constructed in March 1998, equipped with a total of two (2) robotic high volume low pressure (HVLP) spray applicators, exhausting to Vents V27, V28, V29, V34 and V35, capacity:

(1) EU-5.1 and EU-5.2 with solvent based mold release: 37.0 pounds of release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour.

(2) EU-5.1 with water based mold release: 9.8 pounds of release agent per hour, 216 units per hour.

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

(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 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emission rate from the one (1) bonded foam line, identified as EU-04, shall not exceed 22.27 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to T 039-6059-00086, issued on June 11, 1999, and 326 IAC 8-1-6 (New facilities; General reduction requirements), BACT for the foam turnstile production operations, identified as EU-5.1 and EU-5.2, has been determined to be as follows:

(a) High volume low pressure (HVLP) spray application shall be used at all times when the two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU-5.2 are in operation.

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2, with a combined maximum capacity of 400 units per hour, shall be no less than 7% and no more than 0.003 gallons per unit when using solvent based mold release agents. This shall be equivalent to or less than a total of 65.0 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The input of volatile organic compounds (VOC) associated with mold release agents, including clean-up solvents, delivered to the applicators of the closed mold polyurethane foam turnstile production operation, identified as EU-5.3, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to EU-5.3.

(b) The input of volatile organic compounds (VOC) associated with mold release agents, including clean-up solvents, delivered to the applicators of the closed mold polyurethane foam turnstile production operation, identified as EU-5.4, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to EU-5.4.

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the content and usage limitations contained in Conditions D.3.2(b) and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.2(b), the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance with the content and usage limits established in Condition D.3.2(b).

(1) The weight percentage solid content of each mold release agent used.

(2) The amount of mold release agent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the content and usage limits established in Condition D.3.3.

(1) The amount and VOC content by weight of each mold release agent and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to mold release agents and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.2(b) and D.3.3 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 the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) boiler, identified as B1, constructed in 1982, exhausting to Stack V5, rated at 8.36 million British thermal units per hour. [326 IAC 6-2-3]

(b) The following activities with potential uncontrolled particulate emissions less than five (5) pounds per hour or twenty-five (25) pounds per day: One (1) Non-Woven Fiber Line, identified as IS-3, constructed in 2003, equipped with dry filters for particulate control, capacity: 2,500 pounds of fibers per hour. [326 IAC 6-3-2]

(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 2-7-5(1)]

D.4.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from boiler B1 shall not exceed eight-tenths (0.8) pounds of particulate matter per million British thermal units heat input.

D.4.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 the particulate emission rate from the insignificant Non-Woven Fiber Line, identified as IS-3, shall not exceed 4.76 pounds per hour when operating at a process weight rate of 2,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Polyurethane Foam Operations

(a) One (1) foam pouring line, identified as EU-01A/B, constructed in 1982, consisting of a mixer, tunnel, foam block cut, and slab room, exhausting through Vents 14, 15 and 16 and Vents b through i, capacity: 60,000 pounds of foam per hour using TDI or MDI.

(b) Four (4) loop slitting process lines, identified as EU-02B, constructed in 1998, including three (3) adhesive stations used to coat polyurethane foam, equipped with high volume low pressure (HVLP) spray applicators and exhausting to Stacks 22 and 22a, capacity: 0.148 gallons of adhesive per set-up with a maximum set-up rate of 30 set-ups per 8 hours, total. This process also includes two (2) ink stamping lines, identified as EU-6.1 and EU-6.2, installed in 2005.

(d) One (1) bonded foam line, identified as EU-04, constructed in 1990 and modified in 2000, exhausting to Stacks S17 and S18, capacity: 25,000 pounds per hour, consisting of the following equipment:

(1) One (1) foam shredding operation;
(2) One (1) pneumatic conveyer system;
(3) Various storage bins;
(4) One (1) foam dry mixer;
(5) One (1) wet mixer;
(6) One (1) molding unit; and
(7) Various storage operations.

(e) Two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.1 and EU-5.2, constructed in March 1998, equipped with a total of two (2) robotic high volume low pressure (HVLP) spray applicators, exhausting to Vents V27, V28, V29, V34 and V35, capacity:

(1) EU-5.1 and EU-5.2 with solvent based mold release: 37.0 pounds of release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour.

(2) EU-5.1 with water based mold release: 9.8 pounds of release agent per hour, 216 units per hour.

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

Under NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63, Subpart OOOOOO) these facilities are considered as the affected source because these facilities emits hazardous air pollutants (HAPs) and are located at an area source of hazardous air pollutants (HAPs).

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

National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.11419, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions as specified in Table 1 of 40 CFR Part 63, Subpart OOOOOO.

(b) Pursuant to 40 CFR 63.11417, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Source [40 CFR Part 63, Subpart OOOOOO]

Pursuant to 40 CFR Part 63, Subpart OOOOOO, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart OOOOOO (included as Attachment A):

(1) 40 CFR 63.11414(a), (b) and (c)
(2) 40 CFR 63.11415(a), (b) and (c)
(3) 40 CFR 63.11416
(4) 40 CFR 63.11417
(5) 40 CFR 63.11418
(6) 40 CFR 63.11419
(8) 40 CFR 63.11420
(9) Table 1 to Subpart OOOOOO of Part 63

E.1.3 One Time Deadlines Relating to NESHAP (40 CFR 63, Subpart OOOOOO)

The Permittee shall comply with the following notification requirements by the deadline listed:

Requirement	Rule Cite	Affected Facility	Deadline
Submit an initial compliance status report, as required by 40 CFR 63.11417(b)(2), stating that these facilities use no material containing methylene chloride for any purpose on any slabstock flexible foam process.	40 CFR 63.11417(b)(2)	All the facilities listed under this section	Within 180 days after the compliance date

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-17988-00086

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:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY
100 North Senate Avenue
MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-17988-00086

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 DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-17988-00086
Facility: EU-01A/B
Parameter: VOC Emissions
Limit: Less than 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month based on the following equation:

VOC Emissions (tons) = (Catalyst Usage (tons) x Flash Off (%)) + (TDI Usage (tons) x Flash Off (%)) + (MDI Usage (tons) x Flash Off (%))

QUARTER: _____YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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 DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-17988-00086
Facility: EU-5.1 and EU-5.2
Parameter: VOC Emissions
Limit: Less than a total of 65.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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 DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Permit Modification No.: T 039-17988-00086
Facility: EU-5.3
Parameter: VOC emissions from application of mold release agents, including associated clean-up solvents.
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period.

QUARTER: _____YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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 DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Permit Modification No.: T 039-17988-00086
Facility: EU-5.4
Parameter: VOC emissions from application of mold release agents, including associated clean-up solvents.
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period.

QUARTER: _____YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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 DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-17988-00086

Months: _____ **to** _____ **Year:** _____

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.

Attachment A

NESHAP, Subpart OOOOOO

Carpenter Co.
195 County Road 15 South
Elkhart, IN 46516

Significant Permit Modification No.: 039-27979-00086

Subpart OOOOOO—National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources

Source: 72 FR 38910, July 16, 2007, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11414 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source of hazardous air pollutant (HAP) emissions that meets the criteria in paragraph (a)(1) or (2) of this section.

(1) You own or operate a plant that produces flexible polyurethane foam or rebond foam as defined in §63.1292 of subpart III.

(2) You own or operate a flexible polyurethane foam fabrication facility, as defined in §63.11419.

(b) The provisions of this subpart apply to each new and existing affected source that meets the criteria listed in paragraphs (b)(1) through (4) of this section.

(1) A slabstock flexible polyurethane foam production affected source is the collection of all equipment and activities necessary to produce slabstock flexible polyurethane foam.

(2) A molded flexible polyurethane foam production affected source is the collection of all equipment and activities necessary to produce molded foam.

(3) A rebond foam production affected source is the collection of all equipment and activities necessary to produce rebond foam.

(4) A flexible polyurethane foam fabrication affected source is the collection of all equipment and activities at a flexible polyurethane foam fabrication facility where adhesives are used to bond foam to foam or other substrates. Equipment and activities at flexible polyurethane foam fabrication facilities which do not use adhesives to bond foam to foam or other substrates are not flexible polyurethane foam fabrication affected sources.

(c) An affected source is existing if you commenced construction or reconstruction of the affected source on or before April 4, 2007.

(d) An affected source is new if you commenced construction or reconstruction of the affected source after April 4, 2007.

(e) This subpart does not apply to research and development facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(f) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§ 63.11415 What are my compliance dates?

(a) If you own or operate an existing slabstock flexible polyurethane foam production affected source, you must achieve compliance with the applicable provisions in this subpart by July 16, 2008.

(b) If you own or operate an existing molded flexible polyurethane foam affected source, an existing rebond foam production affected sources, or an existing flexible polyurethane foam fabrication affected source, you must achieve compliance with the applicable provisions in this subpart by July 16, 2007.

(c) If you startup a new affected source on or before July 16, 2007, you must achieve compliance with the applicable provisions in this subpart not later than July 16, 2007.

(d) If you startup a new affected source after July 16, 2007, you must achieve compliance with the provisions in this subpart upon startup of your affected source.

Standards and Compliance Requirements

§ 63.11416 What are the standards for new and existing sources?

(a) If you own or operate a slabstock flexible polyurethane foam production affected source, you must meet the requirements in paragraph (b) of this section. If you own or operate a molded foam affected source, you must meet the requirements in paragraph (c) of this section. If you own or operate a rebond foam affected source, you must meet the requirements in paragraph (d) of this section. If you own or operate a flexible polyurethane foam fabrication affected source, you must meet the requirements in paragraph (e) of this section.

(b) If you own or operate a new or existing slabstock polyurethane foam production affected source, you must comply with the requirements in either paragraph (b)(1) or (2) of this section.

(1) Comply with §63.1293(a) or (b) of subpart III, except that you must use Equation 1 of this section to determine the HAP auxiliary blowing agent (ABA) formulation limit for each foam grade instead of Equation 3 of §63.1297 of subpart III. You must use zero as the formulation limitation for any grade of foam where the result of the formulation equation (using Equation 1 of this section) is negative (*i.e.* , less than zero):

$$ABA_{limit} = -0.2(IFD) - 19.1\left(\frac{1}{IFD}\right) - 15.3(DEN) - 6.8\left(\frac{1}{DEN}\right) + 36.5 \quad \text{(Equation 1)}$$

Where:

ABAlimit= HAP ABA formulation limitation, parts methylene chloride ABA allowed per hundred parts polyol (pph).

IFD = Indentation force deflection, pounds.

DEN = Density, pounds per cubic foot.

(2) Use no material containing methylene chloride for any purpose in any slabstock flexible foam production process.

(c) If you own or operate a new or existing molded foam affected source, you must comply with the requirements in paragraphs (c)(1) and (2) of this section.

(1) You must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.

(2) You must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process.

(d) If you own or operate a new or existing rebond foam affected source, you must comply with the requirements in paragraphs (d)(1) and (2) of this section.

(1) You must not use a material containing methylene chloride as an equipment cleaner in a rebond foam process.

(2) You must not use a mold release agent containing methylene chloride in a rebond foam process.

(e) If you own or operate a new or existing flexible polyurethane foam fabrication affected source, you must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process.

(f) You may demonstrate compliance with the requirements in paragraphs (b)(2) and (c) through (e) of this section using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

[72 FR 38910, July 16, 2007, as amended at 73 FR 15928, Mar. 23, 2008]

§ 63.11417 What are the compliance requirements for new and existing sources?

(a) If you own or operate a slabstock flexible polyurethane foam production affected source, you must comply with the requirements in paragraph (b) of this section. If you own or operate a molded foam affected source, rebond foam affected source, or a loop slitter at a flexible polyurethane foam fabrication affected source you must comply with the requirements in paragraphs (c) and (d) of this section.

(b) Each owner or operator of a new or existing slabstock flexible polyurethane foam production affected source who chooses to comply with §63.11416(b)(1) must comply with paragraph (b)(1) of this section. Each owner or operator of a new or existing slabstock flexible polyurethane foam production affected source who chooses to comply with §63.11416(b)(2) must comply with paragraphs (b)(2) and (3) of this section.

(1) You must comply with paragraphs (b)(1)(i) through (v) of this section.

(i) The monitoring requirements in §63.1303 of subpart III.

(ii) The testing requirements in §63.1304 or §63.1305 of subpart III.

(iii) The reporting requirements in §63.1306 of subpart III, with the exception of the reporting requirements in §63.1306(d)(1), (2), (4), and (5) of subpart III.

(iv) The recordkeeping requirements in §63.1307 of subpart III, with the exception of the recordkeeping requirements in §63.1307(a)(1), (b)(1)(i), and (b)(2).

(v) The compliance demonstration requirements in §63.1308(a), (c), and (d) of subpart III.

(2) You must submit a notification of compliance status report no later than 180 days after your compliance date. The report must contain this certification of compliance, signed by a responsible official, for the standards in §63.11416(b)(2): “This facility uses no material containing methylene chloride for any purpose on any slabstock flexible foam process.”

(3) You must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site.

(c) You must have a compliance certification on file by the compliance date. This certification must contain the statements in paragraph (c)(1), (2), or (3) of this section, as applicable, and must be signed by a responsible official.

(1) For a molded foam affected source:

(i) “This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(1).”

(ii) "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2)."

(2) For a rebond foam affected source:

(i) "This facility does not use any equipment cleaner which contains methylene chloride in a rebond flexible polyurethane foam process in accordance with §63.11416(d)(1)."

(ii) "This facility does not use any mold release agent containing methylene chloride in a rebond flexible polyurethane foam process in accordance with §63.11416(d)(2)."

(3) For a flexible polyurethane foam fabrication affected source containing a loop slitter: "This facility does not use any adhesive containing methylene chloride on a loop slitter process in accordance with §63.11416(e)."

(d) For molded foam affected sources, rebond foam affected sources, and flexible polyurethane foam fabrication affected sources containing a loop slitter, you must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site.

[72 FR 38910, July 16, 2007, as amended at 73 FR 15929, Mar. 26, 2008]

Other Requirements and Information

§ 63.11418 What General Provisions apply to this subpart?

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11416(b)(1) are specified in Table 1 of this subpart.

§ 63.11419 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; §63.1292 of subpart III; §63.8830 of subpart MMMMM; §63.2 of subpart A; and in this section as follows:

Flexible polyurethane foam fabrication facility means a facility where pieces of flexible polyurethane foam are cut, bonded, and/or laminated together or to other substrates.

§ 63.11420 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. EPA or a delegated authority such as a State, local, or tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or tribal agency pursuant to 40 CFR part 63, subpart E, then that Agency has the authority to implement and enforce this subpart. You should contact your U.S. EPA Regional Office to find out if this subpart is delegated to a State, local, or tribal agency within your State.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the approval authorities contained in paragraphs (b)(1) through (4) of this section are retained by the Administrator of the U.S. EPA and are not transferred to the State, local, or tribal agency.

(1) Approval of an alternative non-opacity emissions standard under §63.6(g).

(2) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f). A "major change to test method" is defined in §63.90.

(3) Approval of a major change to monitoring under §63.8(f). A "major change to monitoring" is defined in §63.90.

(4) Approval of a major change to recordkeeping/reporting under §63.10(f). A "major change to recordkeeping/reporting" is defined in §63.90.

[72 FR 38910, July 16, 2007, as amended at 73 FR 15929, Mar. 26, 2008]

Table 1 to Subpart OOOOOO of Part 63—Applicability of General Provisions to Subpart OOOOOO

As required in §63.11418, sources subject to §63.11416(b)(1) must comply with the requirements of the NESHAP General Provisions (40 CFR part 63, subpart A) as shown in the following table.

Subpart A reference	Applies to Subpart OOOOOO?	Comment
§63.1	Yes	
§63.2	Yes	Definitions are modified and supplemented by §63.11419.
§63.3	Yes	
§63.4	Yes	
§63.5	Yes	
§63.6(a)–(d)	Yes	
§63.6(e)(1)–(2)	Yes	
§63.6(e)(3)	No	Owners and operators of subpart OOOOOO affected sources are not required to develop and implement a startup, shutdown, and malfunction plan.
§63.6 (f)–(g)	Yes	
§63.6(h)	No	Subpart OOOOOO does not require opacity and visible emissions standards.
§63.6 (i)–(j)	Yes	
§63.7	No	Performance tests not required by subpart OOOOOO.
§63.8	No	Continuous monitoring, as defined in subpart A, is not required by subpart OOOOOO.
§63.9(a)–(d)	Yes	
§63.9(e)–(g)	No	
§63.9(h)	No	Subpart OOOOOO specifies Notification of Compliance Status requirements.
§63.9 (i)–(j)	Yes	
§63.10(a)–(b)	Yes	Except that the records specified in §63.10(b)(2) are not required.

Subpart A reference	Applies to Subpart OOOOOO?	Comment
§63.10(c)	No	
§63.10(d)(1)	Yes	
§63.10(d)(2)–(3)	No	
§63.10(d)(4)	Yes	
§63.10(d)(5)	No	
§63.10(e)	No	
§63.10(f)	Yes	
§63.11	No	
§63.12	Yes	
§63.13	Yes	
§63.14	Yes	
§63.15	Yes	
§63.16	Yes	

[72 FR 38910, July 16, 2007, as amended at 73 FR 15929, Mar. 26, 2008]

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	**Carpenter Co.**
Source Location:	**195 County Road 15 South, Elkhart, IN 46516**
County:	**Elkhart**
SIC Code:	**2297, 2899 and 3086**
Operation Permit No.:	**T039-17988-00086**
Operation Permit Issuance Date:	**February 28, 2008**
Significant Permit Modification No.:	**039-27979-00086**
Permit Reviewer:	**Jenny Acker**

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 039-17988-00086 on February 28, 2008. The source has since received the following approvals:

Administrative Amendment No. 039-26646-00086, issuance date: June 20, 2008
Administrative Amendment No. 039-27308-00086, issuance date: January 16, 2009
Administrative Amendment No. 039-27353-00086, issuance date: May 7, 2009
Significant Permit Modification No. 039-27852-00086, issuance date July 20, 2009

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for $PM_{2.5}$.

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby counties as attainment for the 8-hour ozone standard.

(4) 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. Elkhart 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
Elkhart 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. These rules became effective on July 15, 2008. Indiana has three (3) 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
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other 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 twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	**Emissions** (ton/yr)
PM	Less Than 250
PM_{10}	Less Than 250
$PM_{2.5}$	Less Than 250
SO_2	Less Than 250
VOC	Less Than 250
CO	Less Than 250
NO_X	Less Than 250

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) These emissions are based upon the Technical Support Document (TSD) to Significant Permit Modification No. 039-27852-00086.

The table below summarizes the potential to emit HAPs for the entire source, prior to this modification, after consideration of all enforceable limits established in the effective permits:

HAPs	**Potential To Emit** (ton/yr)
single HAP	less than 10
Total HAP	less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	**Actual Emissions** (ton/yr)
PM	Not Reported
PM_{10}	0.08
SO_2	0.01
VOC	8.85
CO	0.89
NO_X	1.06
Single HAP	Not Reported
Total HAPs	Not Reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Carpenter Co. on May 26, 2009, relating to a change in the type of mold release agents used at EU-5.3 and EU-5.4. EU-5.3 and EU-5.4 are currently permitted as insignificant activities because they use water-based mold release agents exclusively. EU-5.3 was permitted in Administrative Amendment No. 039-19327-00086 (issued October 13, 2004) and EU-5.4 was permitted in Administrative Amendment No. 039-20613-00086 (issued March 10, 2005). Carpenter Co. has requested that EU-5.3 and EU-5.4 be permitted to allow the usage of solvent-based (VOC containing) mold release agents and that all applicable requirements be added to the permit.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

This modification will be incorporated into the Part 70 Operating Permit Renewal through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires a case-by-case determination of an emission limitation or standard and significant changes in existing Part 70 permit terms and conditions.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Limited Potential to Emit (ton/yr)					
Process / Emission Unit	**CO**	**PM**	**PM_{10}**	**NO_X**	**SO_2**	**VOC**
EU-5.3	n/a	0.06	0.06	n/a	n/a	< 25
EU-5.4	n/a	0.06	0.06	n/a	n/a	< 25
Total for Modification	n/a	0.12	0.12	n/a	n/a	< 50
PSD Significant Levels	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification or new source.

NESHAP:

(b) NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63, Subpart OOOOOO)

The two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.3 and EU-5.4 are subject to the requirements of this NESHAP because they participate in the production of flexible polyurethane foam fabrication where adhesives are used to bond foam to foam or other substrates.

Carpenter Co. is considered as an existing affected source under 40 CFR 63, Subpart OOOOOO, because it commenced construction before April 4, 2007.

The Permittee has chosen the option of not using material containing methylene chloride to comply with this NESHAP.

Nonapplicable portions of the NESHAP will not be included in the permit. The source is subject to the following portions of 40 CFR 63, Subpart OOOOOO, which are already included in the permit:

(1) 40 CFR 63.11414(a), (b) and (c)
(2) 40 CFR 63.11415(a), (b) and (c)
(3) 40 CFR 63.11416
(4) 40 CFR 63.11417
(5) 40 CFR 63.11418
(6) 40 CFR 63.11419
(7) 40 CFR 63.11420
(8) Table 1 to Subpart OOOOOO of Part 63

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart OOOOOO.

(c) The two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.3 and EU-5.4, are not subject to the requirements of the NESHAP, 40 CFR 63, Subpart III, National Emission Standards for Flexible Polyurethane Foam Production, because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

(d) The two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.3 and EU-5.4, are not subject to the requirements of the NESHAP, 40 CFR 63, Subpart MMMMM, National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations, because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

CAM:

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit ID	Control Device Used?	Emission Limitation	Uncontrolled PTE (tpy)	Controlled PTE (tpy)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
PM and PM10							
EU-5.3	N	Y	< 100	< 100	100	N	N
EU-5.4	N	Y	< 100	< 100	100	N	N
VOC							
EU-5.3	N	Y	< 100	< 100	100	N	N
EU-5.4	N	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64 (CAM) are not applicable to EU-5.3 or EU-5.4 as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of EU-5.3 and EU-5.4 will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential emissions from the spray application of the release agent at EU-5.3 and EU-5.4 is less than 0.551 lbs/hr. Therefore, pursuant to 326 IAC 6-3-1(b)(14) EU-5.3 and EU-5.4 are exempt from the requirements of 326 IAC 6-3. Note: The application of mold releasing agents is not considered a surface coating application.

326 IAC 8-1-6 (New facilities; General reduction requirements)
Upon issuance of AA 039-19327-00086 (issued on October 13, 2004) the potential emissions from EU-5.3 were less twenty-five (25) tons per year. Upon issuance of AA 039-20613-00086 (issued on March 10, 2005) the potential emissions from EU-5.4 were less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 did not apply to EU-5.3 and EU-5.4, and it was not necessary to limit the VOC emissions to less than twenty-five (25) tons per year per unit. Carpenter Co. has proposed the use of solvent-based (VOC containing) mold release agents at EU-5.3 and EU-5.4, which will result in potential VOC emissions greater than twenty-five (25) tons per year from each unit.

The source has chosen to limit EU-5.3 and EU-5.4, each, to less than less than twenty-five (25) tons per year of VOC. Compliance with these limits will render the requirements of 326 IAC 8-1-6 not applicable to EU-5.3 and EU-5.4.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. 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.

Compliance Determination Requirements

The Compliance Determination Requirements applicable to the closed mold polyurethane foam turnstile production operation, identified as EU-5.3, and the closed mold polyurethane foam turnstile production operation, identified as EU-5.4 are as follows:

Compliance with the content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

This requirement is required to render 326 IAC 8-1-6 (BACT) not applicable.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. 039-17988-00086. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification No. 1:

IDEM, OAQ is revising Section B - Emergency Provisions to allow the Permittee to reference a previously reported emergency under paragraph (b)(5) in the Quarterly Deviation and Compliance Monitoring Report. Condition B.11 has been revised as follows:

B.11 Emergency Provisions [326 IAC 2-7-16]

* * *

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. **Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.**

Modification No. 2:

To incorporate the closed mold polyurethane foam turnstile production operation, identified as EU-5.3, and the closed mold polyurethane foam turnstile production operation, identified as EU-5.4, Section A.2 - Emission Units and Pollution Control Equipment Summary has been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

* * *

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

~~(f)~~**(h)** The following tanks are grouped into four (4) general categories - Primary Pour Tanks (EU-01), Rebond Tanks, Chemical Blending Tanks, and Mold Tanks (EU-05):

* * *

Modification No. 3:

The following revisions have been made to Section D.3:

- The Facility Description box has been modified to incorporate the closed mold polyurethane foam turnstile production operation, identified as EU-5.3, and the closed mold polyurethane foam turnstile production operation, identified as EU-5.4.
- Condition D.3 - Volatile Organic Compounds (VOC) has been added to the permit and renders the requirements of 326 IAC 8-1-6 (BACT) not applicable to EU-5.3 and EU-5.4.
- Compliance Determination, Recordkeeping, and Reporting Requirements have been modified to incorporate requirements necessary to ensure compliance with 326 IAC 8-1-6 limitations, and appropriate recordkeeping and reporting requirements.

Section D.3 has been revised as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Polyurethane Foam Operations

* * *

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

(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 2-7-5(1)]

* * *

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The input of volatile organic compounds (VOC) associated with mold release agents, including clean-up solvents, delivered to the applicators of the closed mold polyurethane foam turnstile production operation, identified as EU-5.3, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to EU-5.3.

(b) The input of volatile organic compounds (VOC) associated with mold release agents, including clean-up solvents, delivered to the applicators of the closed mold polyurethane foam turnstile production operation, identified as EU-5.4, shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable to EU-5.4.

Compliance Determination Requirements

~~D.3.3~~**D.3.4** Volatile Organic Compounds (VOC)

Compliance with the content and usage limitations contained in Condition**s** D.3.2(b) **and D.3.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or

obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.3.4~~**D.3.5** Record Keeping Requirements

* * *

(b) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the content and usage limits established in Condition D.3.3.

(1) The amount and VOC content by weight of each mold release agent and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to mold release agents and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

~~(b)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.3.5~~**D.3.6** Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s** D.3.2(b) **and D.3.3** 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Modification No. 4:

Since EU-5.3 and EU-5.4 are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Source [40 CFR Part 63, Subpart OOOOOO], Section E.1 has been revised as follows:

Facility Description [326 IAC 2-7-5(15)]: Polyurethane Foam Operations

*** * ***

(f) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.3, approved for construction in 2004, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V36.

(g) One (1) closed mold polyurethane foam turnstile production operation, identified as EU-5.4, approved for construction in 2005, equipped with one (1) robotic high volume low pressure (HVLP) spray applicator, with all emissions exhausting to Vent V37.

*** * ***

No additional revisions have were necessary for Section E.1.

Modification No. 5:

The following reporting forms (see next page) have been added to the permit:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: **Carpenter Co.**
Source Address: **195 County Road 15 South, Elkhart, Indiana 46516**
Mailing Address: **P.O. Box 2386, Elkhart, Indiana 46515**
Permit Modification No.: **T 039-17988-00086**
Facility: **EU-5.3**
Parameter: **VOC emissions from application of mold release agents, including associated clean-up solvents.**
Limit: **Less than twenty-five (25) tons per twelve (12) consecutive month period.**

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ **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.

And

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515
Permit Modification No.: T 039-17988-00086
Facility: EU-5.4
Parameter: VOC emissions from application of mold release agents, including associated clean-up solvents.
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period.

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ 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.

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-27979-00086. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emissions Calculations Summary

Company Name: Carpenter Co.
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46516
Permit Number: 039-27979-00086
Reviewer: Jenny Acker
Date: June 17, 2009

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAP**
EU-01A/B	-	-	-	(1) Less than 38.6	-	-	2.98 (MDI) 2.98 (TDI)
EU-02B	-	-	-	9.73	-	-	0.487 (MDI)
EU-6.1 and EU-6.2	-	-	-	3.19	-	-	0.149
Natural Gas Boiler EU-03	0.10	0.42	0.03	0.30	4.62	5.50	0.10
EU-04	14.58	-	-	5.05	-	-	5.05 (MDI) 5.05 (TDI)
EU-5.1 and 5.2	0.59	0.59	-	(1) Less than 65	-	-	0.089
EU-5.3	0.06	0.06	-	(1) Less than 25	-	-	0.05
EU-5.4	0.06	0.06	-	(1) Less than 25	-	-	0.05
All ISO Storage Tanks	-	-	-	0.0017	-	-	0.0017 (MDI) 0.0017 (TDI)
INSIGNIFICANT ACTIVITIES:							
Boiler B1	0.07	0.278	0.022	0.201	3.08	3.66	0.07
Non woven fiber line (IS-3)	3.38	3.38	-	-	-	-	-
Natural Gas Combustion	0.079	0.315	0.025	0.228	3.48	4.14	0.08
Simfla - Mattress Line	-	-	-	-	-	-	-
EU 5.5	2	2	-	-	-	-	-
Blending	-	-	-	0.15	-	-	-
Diesel combustion	0.125	0.125	4.44	0.021	0.313	1.25	0.0004
Total	**21.04**	**7.22**	**4.52**	**172.47**	**11.49**	**14.55**	**<10 Single <25 Total**
PSD Major Source Threshold	**250**	**250**	**250**	**250**	**250**	**250**	**Single 10**

Assume PM2.5 = PM10

(1) Limited by 326 IAC 8-1-6 BACT or as a 326 IAC 8-1-6 BACT Avoidance Limit

Emission calculations for EU-01A/B and EU-04, and emission calculations for HAPs for EU-02B have been determined to be confidential in prior approvals because the data is considered a trade secret. Therefore only emissions totals have been presented for these units:

EU01-A/B

Emissions calculations for the foam pouring line, identified as EU-01A/B, are based on confidential trade secret information. The foam pouring line is a batch operation. Total foam production is based on a twenty-four (24) hour production cycle with actual foam pouring operating up to nine (9) hours per day (3,285 hours per year). Potential to emit calculations for the foam pouring line are therefore based on 3,285 hours of pouring and 8,760 hours of operation. The potential to emit VOC for the foam pouring line, identified as EU-01A/B, is 133 tons per year with no particulate matter emissions. HAP emissions are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs.

EU-02B

The calculation for MDI PTE of EU-02B is based on "MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry". The PTE is less than 0.487 tons per year. The calculation details of the revised PTE is not revealed in the following calculations because the information on airflow, exposed surface area in M^2, and "tack-free" time used in the following formula are claimed as confidential by Carpenter Co.

$$W = 25.4\ VP_{MDI}\ (Mw / T_{proc})\ (u)^{0.78}\ SA\ (t_{TF})$$

Where:
W = the evaporation losses from the open process in gr/day.
VP_{MDI} = the vapor pressure of MDI in atmospheres at a given process temperature.
T_{proc} = the process temperature in °K.
Mw = the molecular weight of MDI
u = the airflow speed in m/sec.
SA = the exposed surface area in M^2.
t_{TF} = the "tack-free" time in seconds.

EU-04

Based on applicant-supplied confidential emission factors and material throughput rates, the potential emissions of the bonded foam line, identified as EU-04, have been verified to be:

	Potential Emissions	
Pollutant	(pounds/hour)	(tons/year)
PM	3.33	14.58
VOC	1.15	5.05
HAPs (TDI)	1.15	5.05

Particulate matter emitted by this process is greater than ten (10) microns in diameter, therefore no PM_{10} is emitted.

Appendix A: Emissions Calculations
VOC, HAP and Particulate
From EU-02B Adhesive Stations

Company Name: **Carpenter Co.**
Address City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Slabond 523-C (Acetone based)	7.0	75.000%	75.0%	0.0%	0.0%	0.00%	0.14800	3.750	0.00	0.00	0.00	0.00	0.00	0.00	NA	100%
Richadh 2354	10.0	40.000%	0.0%	40.0%	0.0%	0.00%	0.14800	3.750	4.00	4.00	2.22	53.32	9.73	0.00	NA	100%
									PM Control Efficiency:	0.00%						
				Total = Worst Case Adhesive						**Uncontrolled**	**2.22**	**53.32**	**9.73**	**0.00**		
The adhesive has no particulate emissions (100% transfer efficiency).										**Controlled**	**2.22**	**53.32**	**9.73**	**0.00**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emissions Calculations
VOC and Particulate
From Closed Mold Polyurethane Foam Operations EU-5.1 and EU-5.2

Company Name: Carpenter Co.
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46516
Permit Number: 039-27979-00086
Reviewer: Jenny Acker
Date: June 17, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Flash Off %	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hour)	Potential VOC (lb/day)	Potential VOC (ton/year)	Particulate Potential (ton/year)	lb VOC/gal solids	Transfer Efficiency
Release Agent RCT - B1208	6.40	96.5%	0.00%	96.5%	0.00%	7.00%	100%	0.006	400	6.18	6.18	14.8	356	64.9	0.589	88.2	75.0%
Part A Blend																	
Isocyanate NPU 586203	10.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00002%	0.031	400	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Isocyanate	10.16	0.00%	0.00%	0.00%	0.00%	0.00%	0.005%	0.121	400	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Fire Retardant	12.7	0.010%	0.00%	0.010%	0.00%	0.00%	0.00%	0.011	400	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Part B Blend																	
Carpol GP 5015	8.50	0.050%	0.050%	0.00%	0.00%	0.00%	0.00%	0.249	400	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Arcol E-519	8.83	0.040%	0.040%	0.00%	0.040%	28.0%	0.00%	0.113	400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Surfactant	8.39	0.300%	0.00%	0.300%	2.70%	0.00%	0.00%	0.004	400	0.026	0.025	0.00	0.00	0.00	0.00	N/A	100%
Cross-Linker	9.00	100%	15.5%	84.5%	16.7%	0.00%	0.001%	0.006	400	9.13	7.61	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	8.66	100%	0.00%	100%	0.00%	0.00%	0.00%	0.001	400	8.66	8.66	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	8.66	100%	2.70%	97.3%	2.80%	0.00%	0.00%	0.002	400	8.67	8.43	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	9.50	0.200%	0.200%	0.00%	0.200%	0.00%	0.00%	0.00	400	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
								PM Control Efficiency:		0.00%							
											Uncontrolled	**14.8**	**356**	**64.9**	**0.589**		
											Controlled	**14.8**	**356**	**64.9**	**0.589**		

Calculations are based on the worst case potential to emit catalyst and TDI-80 mixtures.

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emissions Calculations
VOC and Particulate
From Closed Mold Polyurethane Foam Operations EU-5.3 and EU-5.4

Company Name: Carpenter Co.
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46516
Permit Number: 039-27979-00086
Reviewer: Jenny Acker
Date: June 17, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Flash Off %	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hour)	Potential VOC (lb/day)	Potential VOC (ton/year)	Particulate Potential (ton/year)	lb VOC/gal solids	Transfer Efficiency
Release Agent RCT - A1346	6.42	99.0%	0.00%	99.0%	0.00%	7.00%	100%	0.004	204	6.36	6.36	5.2	124	22.7	0.057	90.8	75.0%
Part A Blend																	
Isocyanate NPU 586203	10.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00002%	0.031	204	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Isocyanate	10.16	0.00%	0.00%	0.00%	0.00%	0.00%	0.005%	0.121	204	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Fire Retardant	12.7	0.010%	0.00%	0.010%	0.00%	0.00%	0.00%	0.011	204	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
									204								
Part B Blend																	
Carpol GP 5015	8.50	0.050%	0.050%	0.00%	0.00%	0.00%	0.00%	0.249	204	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Arcol E-519	8.83	0.040%	0.040%	0.00%	0.040%	28.0%	0.00%	0.113	204	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Surfactant	8.39	0.300%	0.00%	0.300%	2.70%	0.00%	0.00%	0.004	204	0.026	0.025	0.00	0.00	0.00	0.00	N/A	100%
Cross-Linker	9.00	100%	15.5%	84.5%	16.7%	0.00%	0.001%	0.006	204	9.13	7.61	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	8.66	100%	0.00%	100%	0.00%	0.00%	0.00%	0.001	204	8.66	8.66	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	8.66	100%	2.70%	97.3%	2.80%	0.00%	0.00%	0.002	204	8.67	8.43	0.00	0.00	0.00	0.00	N/A	100%
Catalyst	9.50	0.200%	0.200%	0.00%	0.200%	0.00%	0.00%	0.00	204	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%

PM Control Efficiency: 0.00%

Uncontrolled (Each EU-5.3 & EU-5.4)	**5.2**	**124**	**22.7**	**0.057**
Controlled (Each EU-5.3 & EU-5.4)	**5.2**	**124**	**22.7**	**0.057**

Calculations are based on the worst case potential to emit catalyst and TDI-80 mixtures.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Flash Off (%) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emissions Calculations
HAP Emissions
From Closed Mold Polyurethane Foam Operations EU-5.1 through EU-5.4

Company Name: **Carpenter Co.**
Address City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
SPM Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

Toluene Diisocyanate (TDI):

Polyurethane foam industry TDI emission factor = 50 lbs TDI / 1,000,000 lbs = 0.00005

Emission Units	Density of Isocyante (lb/gal)	Weight % TDI	Gal of Mat (gal/unit)	Maximum (unit/hr)	Potential HAP Emissions (tons/yr)
EU-5.1 & EU-5.2 (total)	10.16	0.810	0.121	400	0.087
EU-5.3 & EU-5.4 (total)	10.16	0.810	0.121	408	0.089

Diethanolamine (DEOA): 0.00001

Polyurethane foam industry DEOA emission factor = 10 lbs TDI / 1,000,000 lbs =

Emission Units	Density of Cross-Linke (lb/gal)	Weight % DEOA	Gal of Mat (gal/unit)	Maximum (unit/hr)	Potential HAP Emissions (tons/yr)
EU-5.1 & EU-5.2 (total)	10.16	0.870	0.006	804	0.002
EU-5.3 & EU-5.4 (total)	10.16	0.810	0.121	408	0.018

4-4 Methylenediphenyl Diisocyanate (MDI):

Emission Units	MDI Vapor Pressure (mm Hg)	Barometric Pressure (mm Hg)	Number of Molds	Mold Volume (ft^3)	Saturated Vapor Pressure $(SVC)_{ppm}$	aturated Vapor Pressur $(SVC)_{lbs/ft^3}$	Total Volume of Mold ft^3/mold	Total MDI Released per Mold (lbs/mold)	Total MDI Released per Year (tons/yr)
EU-5.1 & EU-5.2 (total)	1400	760.00	2	2	1.84	0.000001	4.00	0.000005	0.0002
EU-5.3 & EU-5.4 (total)	1400	760.00	2	2	1.84	0.000001	4.00	0.000005	0.0002

Emission Factors taken from "MDI / Polymeric MDI Reporting Guidelines for the Polyurethane Industry: for Section 313 of EPCRA and State Reporting (Completing EPA's Form R)"

METHODOLOGY

Potential HAP Emissions (tons/yr) = Density (lb/gal) x Weight % HAP x Gallons of Material (gal/unit) x Maximum (unit/hr) x Emission Factor x (8760 hrs / year) x (ton / 2000 lbs)
Saturated Vapor Pressure $(SVC)_{ppm}$ = HAP Vapor Pressure (mm Hg) / Barometric Pressure (mm Hg)
Saturated Vapor Pressure $(SVC)_{lbs/ft^3}$ = Saturated Vapor Pressure (SVC)ppm x (10.2mg / M^3 MDI / 1 part per million) x (2.2lb/1,000,000mg) x (1M^3 / 35.31ft^3)
Total Volume of Mold (ft^3/mold) = Number of Molds x Mold Volume (ft^3)
Total MDI Released per Mold (lbs/mold) = Saturated Vapor Pressure (SVC)lbs/ft^3 x Total Volume of Mold (ft^3/mold)
Total MDI Release per Year (tons/yr) = Total MDI Released per Mold (lbs/mold) x (1 mold / 8.13 min) x (60 min/hr) x (8760 hrs/yr) (1 ton / 2,000 lbs)

Appendix A: Emissions Calculations
VOC, HAP and Particulate
From Ink Stamping Lines EU-6.1 and EU-6.2

Company Name: Carpenter Co.
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46516
Permit Number: 039-27979-00086
Reviewer: Jenny Acker
Date: June 17, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-6.1																
Ink 1	6.91	100.00%	0.00%	100.0%	0.00%	0.00%	0.0410	1.00	6.91	6.91	0.28	6.80	1.24	0.00	N/A	100%
Ink 2	6.71	100.00%	0.00%	100.0%	0.00%	0.00%	0.0120	1.00	6.71	6.71	0.08	1.93	0.35	0.00	N/A	100%
EU-6.2																
Ink 1	6.91	100.00%	0.00%	100.0%	0.00%	0.00%	0.0410	1.00	6.91	6.91	0.28	6.80	1.24	0.00	N/A	100%
Ink 2	6.71	100.00%	0.00%	100.0%	0.00%	0.00%	0.0120	1.00	6.71	6.71	0.08	1.93	0.35	0.00	N/A	100%
									PM Control Efficiency:	0.00%						
Total = Sum of all inks										**Uncontrolled**	**0.73**	**17.46**	**3.19**	**0.00**		
										Controlled	**0.73**	**17.46**	**3.19**	**0.00**		

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Chromium	Chromium Emissions (ton/yr)
EU-6.1					
Ink 1	6.91	0.041000	1.00	6.00%	0.074
Ink 2	6.71	0.012000	1.00	0.00%	0.000
EU-6.2					
Ink 1	6.91	0.041000	1.00	6.00%	0.074
Ink 2	6.71	0.012000	1.00	0.00%	0.000
					0.149

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Carpenter Co.**
Address City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
Boiler EU-03	12.55	109.938	0.104	0.418	0.033	5.497	0.302	4.617
Boiler B-1 (Insignificant)	8.36	73.2336	0.070	0.278	0.022	3.662	0.201	3.076
Other insignificant units	9.45	82.782	0.079	0.315	0.025	4.139	0.228	3.477
Total	**30.36**	**266**	**0.253**	**1.01**	**0.080**	**13.3**	**0.73**	**11.2**

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.0750	1.8000	0.0034
Potential to Emit					
Boiler EU-03	0.0001	0.0001	0.0041	0.0989	0.0002
Boiler B-1 (Insignificant)	0.0001	0.0000	0.0027	0.0659	0.0001
Other insignificant units	0.0001	0.0000	0.0031	0.0745	0.0001

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	HAPs
Potential to Emit						
Boiler EU-03	0.0000	0.0001	0.0001	0.0000	0.0001	0.104
Boiler B-1 (Insignificant)	0.0000	0.0000	0.0001	0.0000	0.0001	0.069
Other insignificant units	0.0000	0.0000	0.0001	0.0000	0.0001	0.078
					Total:	0.251

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Insignificant Activities

Company Name: **Carpenter Co.**
Address, City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
2.0	125	0.500

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.00	71.0 *(142.0S)*	20.0	0.340	5.00
Potential Emission in tons/yr	0.125	4.443	1.251	0.021	0.313

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: **Carpenter Co.**
Address, City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	0.000004	0.000003	0.000003	0.000003	0.000009
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.0000	0.000

	HAPs - Metals (continued)				
	Mercury	Manganese	Nickel	Selenium	Total
Emission Factor in lb/mmBtu	0.000003	0.000006	0.000003	0.00002	HAPs
Potential Emission in tons/yr	0.0000	0.0001	0.0000	0.000	0.0004

Methodology
No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Particulate Emissions
From Insignificant Non-Woven Fiber Line (IS-3)

Company Name: **Carpenter Co.**
Address City IN Zip: **195 County Road 15 South, Elkhart, Indiana 46516**
Permit Number: **039-27979-00086**
Reviewer: **Jenny Acker**
Date: **June 17, 2009**

Run Time (minutes)	60.0
Pounds of Matted Fiber Produced on the Run Time	2500
Production Rate (lbs/hr)	2500
Dust Collected During Production Run (lbs)	1.74
Total Pounds of Dust Generated During Production Run (lbs)	1.78
Filter Efficiency	98.0%
Pounds of Dust Generated per Hour (lbs/hr)	1.78
Pounds of Dust Generated per Pound of Material Produced (lb/lb)	0.071%
% PM Greater than 100 Microns	43.4%
Uncontrolled PM Potential to Emit (tons/yr)	3.38
Controlled PM Potential to Emit (tons/yr)	0.068

METHODOLOGY

Production Rate (lbs/hr) = (Pounds of Matted Fiber Produced on the Run Time / Production Rate (lbs/hr)) x Run Time (minutes)
Total Pounds of Dust Generated During Production Run = Dust Collected During Production Run (lbs) / Filter Efficiency
Pounds of Dust Generated per Hour (lbs/hr) = Total Pounds of Dust Generated During Production Run (lbs) x Run Time (min) / (60 minutes/hr)
Pounds of Dust Generated per Pound of Material Produced (lb/lb) = Production Rate (lbs/hr) / Pounds of Dust Generated per Hour (lbs/hr)
% PM Greater than 100 Microns determined through a sieve analysis
Uncontrolled PM Potential to Emit (tons/yr) = Total Pounds of Dust Generated During Production Run (lbs) x % of PM Greater than 100 Microns x (8760 hrs/yr) x (1 ton / 2000 lbs)
Controlled PM Potential to Emits (tons/yr) = Uncontrolled PM Potential to Emit (tons/yr) x (1-Filter Efficiency)

Appendix A: Emissions Calculations
VOC and Particulate
From Insignificant EU-5.3 and Simfla - Mattress Line

Company Name: Carpenter Co.
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46516
Permit Number: 039-27979-00086
Reviewer: Jenny Acker
Date: June 17, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-5.5																
Release agent PURA 11180W	8.26	85.45%	85.45%	0.0%	84.70%	14.55%	0.0117	216	0.00	0.00	0.00	0.00	0.00	2.00	0.00	85%

There are no VOC or HAPs in this water based material. PM Control Efficiency: 0.00%

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Simfla - Mattress Line	8.84	46.00%	46.00%	0.0%	48.82%	51.18%	0.00500	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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: Jay Miller
Carpenter Co.
195 CR 15 S.
Elkhart IN 46516

DATE: September 25, 2009

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

SUBJECT: Final Decision
Significant Permit Modification
039-27979-00086

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:
Jacob Fife Div. Mgr. Carpenter Co.
Elizabeth Hill Bruce Carter Assoc
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.

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

Sept. 25, 2009

TO: Elkhart Public Library

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

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

Applicant Name: **Carpenter Co.**
Permit Number: **039-27979-00086**

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	BMILLER 9/25/2009 Carpenter Co. 039-27979-00086 (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**

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6		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 *(Affected Party)*									
7		Ms. Elizabeth Hill Bruce Carter Associates 616 S 4th Street Elkhart IN 46516 *(Consultant)*									
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