



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: Sept. 4, 2009

RE: Toyota Boshoku America / 051-27983-00050

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Toyota Boshoku America
667 West Gach Road
Princeton, Indiana 47670**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M051-27983-00050	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Sept. 4, 2009 Expiration Date: Sept. 4, 2014

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary auto seat manufacturing & assembly plant.

Source Address:	667 West Gach Road, Princeton, Indiana 47670
Mailing Address:	667 West Gach Road, Princeton, Indiana 47670
General Source Phone Number:	812-385-2040
SIC Code:	3714
County Location:	Gibson (Patoka Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Determination

This source consists of the following plants:

- (a) Toyota Boshoku America (TBA) is located at Southeast of the intersection of CR100W and CR550S (Tulip Tree Drive), Princeton, IN, 47670, Plant ID 051-00050; and
- (b) Total Interior Systems America LLC, (TISA) is located at 1698 South 100 West, Princeton, IN 47640, Plant ID 051-00045.

IDEM has reviewed the relationship between the proposed Toyota Boshoku America plant (TBA) and the existing Total Interior Systems plant (TISA) to determine if they meet the definition of a single source. The term "source" is defined at 326 IAC 1-2-73. In order for these two plants to be considered one source, they must meet all three of the following:

- (1) the plants must be owned or operated by the same person or by persons under common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) The sources must be located on the same property or on contiguous or adjacent properties.

The two sources will be under common ownership. TBA and TISA have the same parent company. The two plants met the requirements of the first part of the definition of a source.

TBA and TISA do not have the same two digit SIC Code. The two digit SIC Code for TISA is 30 for Major Group 30: Rubber and Miscellaneous Plastics Products. The two digit SIC Code for TBA is 37 for Major Group 37: Transportation Equipment. TBA will be supplying output to TISA. In the first two years of operation, TBA will be running at partial capacity. During that time, all of TBA's output will go to TISA. As TBA ramps up its capacity in the third and fourth years of operation, more of its output will go to other plants. By TBA's fifth year of operation, less than 50% of its output will be going to TISA. TBA will not need any additional air permit approval in order to achieve full production by the fifth year of operation. All of the other plants that will receive output for TBA will share the same parent company as TBA. Since

TBA will be a new plant that will be gradually ramping up production and since less than 50% of TBA's full production will be dedicated to TISA, TBA will not be a support facility to TISA. Therefore, the second part of the definition is not met.

TBA will be located on the same property as TISA, so the third part of the definition is met.

TBA and TISA do not meet all three parts of the source definition and therefore will be permitted as separate sources. IDEM, OAQ will reexamine the relationship between the sources if TBA sends 50% or more of its output to TISA in the fifth year of TBA's operation or at any later time.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02B, approved for construction in 2009, with a maximum capacity of 69 vehicle units per hour, using no control equipment, venting to stacks S-2B1 and S-2B2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02B, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

- (b) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02A, constructed in 2008, approved for modification in 2009, using Polyol and Isocyanate and applying water based mold release to mold, with a maximum capacity of 37.5 vehicle units per hour, using no control equipment, venting to stacks S-2A1 and S-2A2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02A, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

- (c) One (1) frame welding and assembly area, identified as EU-01, constructed in 2008, approved for modification in 2009, with a capacity of 180 vehicle units per hour, consuming 234.0 pounds of welding wire per hour, using no control equipment, exhausting inside the building.

- (d) One (1) Round Recliner Rust Inhibitor application process, identified as EU-03A, constructed in 2008, cleaning and applying rust inhibitor-oil to auto seat round recliner assembly, with a maximum capacity of 541.67 pieces of Round Recliners per hour, using no control equipment, exhausting inside the building.

- (e) Two (2) natural gas-fired boilers; identified as boiler EU-03B-1 and stand-by boiler EU-03B-2, both constructed in 2008, each with a rated capacity of 1.86 MMBtu/hour, using no control equipment, exhausting to stacks S-3 and S-4, respectively.

- (f) One (1) natural gas-fired space heater, constructed in 2008, with a rated capacity of 4.0 MMBtu/hour, using no control equipment, venting outside the building.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M051-27983-00050, 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, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability

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.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification 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.

B.12 Preventive Maintenance Plan [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 (PMP) 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 PMP 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMP 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M051-27983-00050 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days 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 2-6.1 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.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

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

B.18 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

- (b) 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.21 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.14 Response to Excursions or Exceedances

- (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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and

expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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
- (b) 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.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02B, approved for construction in 2009, with a maximum capacity of 69 vehicle units per hour, using no control equipment, venting to stacks S-2B1 and S-2B2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02B, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

- (b) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02A, constructed in 2008, approved for modification in 2009, using Polyol and Isocyanate and applying water based mold release to mold, with a maximum capacity of 37.5 vehicle units per hour, using no control equipment, venting to stacks S-2A1 and S-2A2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02A, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

- (c) One (1) frame welding and assembly area, identified as EU-01, constructed in 2008, approved for modification in 2009, with a capacity of 180 vehicle units per hour, consuming 234.0 pounds of welding wire per hour, using no control equipment, exhausting inside the building.

- (d) One (1) Round Recliner Rust Inhibitor application process, identified as EU-03A, constructed in 2008, cleaning and applying rust inhibitor-oil to auto seat round recliner assembly, with a maximum capacity of 541.67 pieces of Round Recliners per hour, using no control equipment, exhausting inside the building.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the frame welding facility shall not exceed 18.03 pounds per hour when operating at a process weight rate of 9.12 ton per hour (which is the sum of the welding rod usage and the vehicle unit production rate.)

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

Interpolation of the data for the process weight rate up to 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 D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Two (2) natural gas-fired boilers; identified as boiler EU-03B-1 and stand-by boiler EU-03B-2, both constructed in 2008, each with a rated capacity of 1.86 MMBtu/hour, using no control equipment, exhausting to stacks S-3 and S-4, respectively.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 6-2, Particulate Emission Limitations for Sources of Indirect Heating, the particulate matter (PM) emissions from each of the two (2) boilers, identified as EU-03B-1 & EU-03B-2, shall be limited to six-tenths (0.6) pound per million British thermal units (lb/MMBtu).

SECTION E.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02A, constructed in 2008, approved for modification in 2009, using Polyol and Isocyanate and applying water based mold release to mold, with a maximum capacity of 37.5 vehicle units per hour, using no control equipment, venting to stacks S-2A1 and S-2A2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02A, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

- (b) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02B, approved for construction in 2009, with a maximum capacity of 69 vehicle units per hour, using no control equipment, venting to stacks S-2B1 and S-2B2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02B, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.1.1 General Provisions Relating to NESHAP 63.11414 Subpart OOOOOO (Flexible Polyurethane Foam Production and Fabrication Area Sources) [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 in accordance with 40 CFR 63 Subpart OOOOOO on and after the initial compliance date: July 16, 2007.
- (b) Pursuant to 40 CFR 63.10, 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 Affected Facilities per 40 CFR 63.11414, Subpart OOOOOO

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

The existing affected source associated with the owner or operator of facilities where pieces of flexible polyurethane foam are cut, bonded, and/or laminated together or to other substrates, as defined in 40 CFR 63.11419, that is an area source of hazardous air pollutant (HAP) emissions.

The specific affected facilities at this source, which include each product finishing section, each material recovery section, and each product storage section, are as follows:

Two enclosed-mold flexible polyurethane foam production lines, EU-02A & EU-02B

E.1.3 Applicable Provisions from 40 CFR Part 63.11414, Subpart OOOOOO

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart OOOOOO (see Attachment A), except as otherwise specified in 40 CFR Part 63, Subpart OOOOOO.

Nonapplicable portions of this NESHAP will not be included in the permit. Applicable portions of the NESHAP 40 CFR 63, Subpart OOOOOO are as follows:

- 40 CFR 63.11414(a)(1),
- 40 CFR 63.11414(b)(2)
- 40 CFR 63.11414(b)(4)
- 40 CFR 63.11414(d)
- 40 CFR 63.11414(e)
- 40 CFR 63.11414(f)
- 40 CFR 63.11415(d)
- 40 CFR 63.11416(c)
- 40 CFR 63.11416(e)
- 40 CFR 63.11416(f)
- 40 CFR 63.11417(a),
- 40 CFR 63.11417(c)(1)
- 40 CFR 63.11417(d)
- 40 CFR 63.11418
- 40 CFR 63.11419
- 40 CFR 63.11420

Applicable portions of Table 1 of 40 CFR 63, Subpart OOOOOO

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Toyota Boshoku America
Source Address: 667 West Gach Road, Princeton, Indiana 47670
Mailing Address: 667 West Gach Road, Princeton, Indiana 47670
MSOP No.: M051-27983-00050

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Toyota Boshoku America
Address:	667 West Gach Road
City:	Princeton, Indiana 47670
Phone #:	812-385-2040
MSOP #:	M051-27983-00050

I hereby certify that Toyota Boshoku America is :

still in operation.

no longer in operation.

I hereby certify that Toyota Boshoku America is :

in compliance with the requirements of MSOP M051-27983-00050.

not in compliance with the requirements of MSOP M051-27983-00050.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Permit Administration & Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Toyota Boshoku America
667 West Gach Road
Princeton, Indiana 47670

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that Toyota Boshoku America 667 West Gach Road, Princeton, Indiana 47670, completed construction of the enclosed-mold flexible polyurethane foam production line on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 27, 2009 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M051-27983-00050, Plant ID No. 051-00050 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20____, My Commission expires: _____.

Signature _____

Name _____
(typed or printed)

Attachment A

**National Emission Standards for Hazardous Air Pollutants (NESHAP) for
Flexible Polyurethane Foam Production and Fabrication Area Sources
40 CFR 60.11414, Subpart OOOOOO**

**In support of a
Minor State Operating Permit (MSOP)**

Source Name:	Toyota Boshoku America
Source Location:	667 West Gach Road, Princeton, Indiana 47670
County:	Gibson
SIC Code:	3714
Operation Permit No.:	051-27983-00050
Permit Reviewer:	Sandra Carr

40 CFR 60.11414, Subpart OOOOOO

National Emission Standards for Hazardous Air Pollutants (NESHAP) for

Flexible Polyurethane Foam Production and Fabrication Area Sources

TITLE 40: PROTECTION OF ENVIRONMENT

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

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

e-CFR Data is current as of June 17, 2009

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):

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

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 MMMM; §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.
§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 Registration Transitioning to a Minor Source Operating Permit (MSOP) with New Source Construction

Source Description and Location
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Source Name:	Toyota Boshoku America
Source Location:	667 West Gach Road, Princeton, Indiana 47670
County:	Gibson (Patoka Township)
SIC Code:	3714
Operation Permit No.:	051-27983-00050
Permit Reviewer:	Sandra Carr

On May 27, 2009, the Office of Air Quality (OAQ) received an application from Toyota Boshoku America related to the construction and operation of new emission units at an existing auto seat manufacturing plant and transition from a Registration to a MSOP due to the construction of new emissions units.

Source Definition

This source consists of the following plants:

- (a) Toyota Boshoku America (TBA) is located at Southeast of the intersection of CR100W and CR550S (Tulip Tree Drive), Princeton, IN, 47670, Plant ID 051-00050; and
- (b) Total Interior Systems America LLC, (TISA) is located at 1698 South 100 West, Princeton, IN 47640, Plant ID 051-00045.

IDEM has reviewed the relationship between the proposed Toyota Boshoku America plant (TBA) and the existing Total Interior Systems plant (TISA) to determine if they meet the definition of a single source. The term "source" is defined at 326 IAC 1-2-73. In order for these two plants to be considered one source, they must meet all three of the following:

- (1) the plants must be owned or operated by the same person or by persons under common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the sources must be located on the same property or on contiguous or adjacent properties.

The two sources will be under common ownership. TBA and TISA have the same parent company. The two plants met the requirements of the first part of the definition of a source.

TBA and TISA do not have the same two digit SIC Code. The two digit SIC Code for TISA is 30 for Major Group 30: Rubber and Miscellaneous Plastics Products. The two digit SIC Code for TBA is 37 for Major Group 37: Transportation Equipment. TBA will be supplying output to TISA. In the first two years of operation, TBA will be running at partial capacity. During that time, all of TBA's output will go to TISA. As TBA ramps up its capacity in the third and fourth years of operation, more of its output will go to other plants. By TBA's fifth year of operation, less than 50% of its output will be going to TISA. TBA will not need any additional air permit approval in order to achieve full production by the fifth year of operation. All of the other plants that will receive output for TBA will share the same parent company as TBA. Since TBA will be a new plant that will be gradually ramping up production and since less than 50% of TBA's full production will be dedicated to TISA, TBA will not be a support facility to TISA. Therefore, the second part of the definition is not met.

TBA will be located on the same property as TISA, so the third part of the definition is met.

TBA and TISA do not meet all three parts of the source definition and therefore will be permitted as separate sources. IDEM, OAQ will reexamine the relationship between the sources if TBA sends 50% or more of its output to TISA in the fifth year of TBA's operation or at any later time.

This determination was initially made under Registration No. 051-25558-00050, issued on September 8, 2008.

Existing Approvals

The source has been operating under Registration No. 051-25558-00050, issued on September 8, 2007. Due to this application, the source is transitioning from a Registration to a MSOP.

County Attainment Status

The source is located in Gibson County.

Pollutant	Designation
SO ₂	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for the Montgomery Twp for PM_{2.5}. The remainder of Gibson County is unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

(Air Pollution Control Board; 326 IAC 1-4-27; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Gibson 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) **PM_{2.5}**
 Montgomery Township in Gibson County, has been classified as nonattainment for PM_{2.5}. However, this source is located in Patoka Township. Therefore, the source is located in an area of Gibson County that has been classified as attainment or unclassifiable for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
 Gibson County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Toyota Boshoku America on May 27, 2009, relating to construction of a new polyurethane foam production line, correction to the description of EU-02A, and an increase in capacity to the frame and assembly area (EU-01) of their existing auto seat manufacturing plant.

The following is the new emission unit:

- (a) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02B, approved for construction in 2009, with a maximum capacity of 69 vehicle units per hour, using no control equipment, venting to stacks S-2B1 and S-2B2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02B, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

The following are the modified descriptions of emission units:

- (b) One (1) enclosed mold flexible polyurethane foam production line for auto seat manufacturing, identified as EU-02A, constructed in 2008, approved for modification in 2009, using Polyol and Isocyanate and applying water based mold release to mold, with a maximum capacity of 37.5 vehicle units per hour, using no control equipment, venting to stacks S-2A1 and S-2A2.

Under NESHAP 40 CFR 63 Subpart OOOOOO, the flexible polyurethane foam production line, identified as EU-02A, is considered a molded flexible polyurethane foam production affected source as part of an existing automobile seat manufacturing facility.

The pre-construction maximum capacity of EU-02A was predicted to be 45 vehicle units per hour. The true maximum capacity after construction is 37.5 vehicle units per hour. The description has been revised to indicate a maximum capacity of 37.5 vehicle units/hr.

- (c) One (1) frame welding and assembly area, identified as EU-01, constructed in 2008, approved for modification in 2009, with a capacity of 180 vehicle units per hour, consuming 234.0 pounds of welding wire per hour, using no control equipment, exhausting inside the building.

The maximum capacity of EU-01 has been increased from 45 vehicle units per hour to 180 vehicle units/hr and the use of welding wire has increased from 58.5 pounds per hour to 234 lb/hr. The description has been revised to indicate an increase to a maximum capacity of 180 vehicle units/hr and a maximum usage of 234 lb/hr.

Background and Description of Permitted Emission Units

The following is a list of the permitted emission units and pollution control devices that are not being modified:

- (d) One (1) Round Recliner Rust Inhibitor application process, identified as EU-03A, constructed in 2008, cleaning and applying rust inhibitor-oil to auto seat round recliner assembly, with a maximum capacity of 541.67 pieces of Round Recliners per hour, using no control equipment, exhausting inside the building.
- (e) Two (2) natural gas-fired boilers; identified as boiler EU-03B-1 and stand-by boiler EU-03B-2, constructed in 2008, each with a rated capacity of 1.86 MMBtu/hour, using no control equipment, exhausting to stacks S-3 and S-4, respectively.
- (f) One (1) natural gas-fired space heater, constructed in 2008, with a rated capacity of 4 MMBtu/hour, using no control equipment, venting outside the building.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.” The following table reflects the unlimited potential to emit (PTE) of the entire source before controls:

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	Worst Single HAP
Foam Production (EU-02A, existing)	negl.	negl.	negl.	negl.	negl.	10.86	negl.	negl.	negl.
Foam Production (EU-02B, new)	negl.	negl.	negl.	negl.	negl.	19.99	negl.	negl.	negl.
Rust Inhibitor (EU-03A)	negl.	negl.	negl.	negl.	negl.	0.95	negl.	0.28	0.28 (Xylene)
Welding (EU-01, existing)	1.33	1.33	1.33	negl.	negl.	negl.	negl.	0.12	0.03 (Manganese)
Welding (EU-01, new capacity)	4.00	4.00	4.00	negl.	negl.	negl.	negl.	0.11	0.08 (Manganese)
Combustion (EU-03B1, EU-03B2 + Space heater)	0.06	0.25	0.25	0.02	3.32	0.18	2.78	0.06	0.15 (Hexane)
Total PTE of Entire Source	5.39	5.58	5.58	0.02	3.32	31.99	2.78	0.81	0.45 (Manganese)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAP is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60.580, Subpart FFF, for Flexible Vinyl and Urethane Coating and Printing Operations (326 IAC 12-1-1), because it does not have a rotogravure printing line used to print or coat flexible vinyl or urethane products. This source manufactures molded polyurethane foam automobile seats.
- (b) The two (2) natural gas-fired process boilers, identified as boiler EU-03B-1 & stand-by boiler EU-03B-2, each rated at 1.86 million British thermal units per hour (MMBtu/hr), are not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40, 40 CFR 60.40a, 40 CFR 60.40b and 40 CFR 60.40c, Subparts Da, Db, and Dc, respectively, because each boiler has a capacity of less than ten (10) million British thermal units per hour (MMBtu/hr).
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) This source is not subject to the requirements of the 40 CFR 63.480, Subpart T (326 IAC 20-6), NESHAP for Halogenated Solvent Cleaning, because the rust coating production line, identified as EU-03A, does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production, 40 CFR 63.1290, Subpart III (326 IAC 20-22) are not included in the permit, since this source is not a major source of HAP.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Fabrication Operations 40 CFR Part 63.8780, Subpart M (326 IAC 20-66), because this source is not a major source of HAP.
- (g) This source is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because, although this source meets the definition of an area source, as defined in 40 CFR § 63.2, no methylene chloride is used for paint stripping operations, the surface coating operations performed at this source do not include refinishing of mobile vehicles or equipment as described in § 63.11169(b) and the coatings used at this source do not contain the target HAP; which are chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), as defined in § 63.11180.
- (h) This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR

63.11414, Subpart OOOOOO, because it is an area source of HAP and the plant produces flexible polyurethane foam.

This source consists of two molded flexible polyurethane foam production affected source (EU-02A, EU-02B). A molded flexible polyurethane foam production affected source is defined as the collection of all equipment and activities necessary to produce molded foam.

Toyota Boshoku America (TBA) is an existing affected source because it was constructed or reconstructed on or before April 4, 2007. This source was required to be in compliance upon startup and, in order to maintain compliance; shall continue not to use catalyst, adhesive or cleaning materials, containing Methylene chloride in the molded foam production and fabrication process.

The Permittee is primarily engaged in the manufacture automobile seats, under the SIC code 3714. This existing source uses an enclosed mold process to produce molded polyurethane foam automobile seats.

As a secondary product, the source welds frames and applies rust protection to metal reclining seat assemblies. This process line (EU-01) is not subject to the requirements of NESHAP 40 CFR 63, subpart OOOOOO.

Therefore, the provisions of 40 CFR 63, subpart OOOOOO are applicable to the two enclosed mold flexible polyurethane foam production lines at this source and will be included in this permit (see Attachment A).

The units subject to this rule include the following:

Two enclosed mold flexible polyurethane foam production lines, identified as EU-02A & EU-02B

Non applicable portions of the NESHAP will not be included in the permit. Applicable portions of the NESHAP 40 CFR 63, Subpart OOOOOO are the following:

40 CFR 63.11414(a)(1),
40 CFR 63.11414(b)(2)
40 CFR 63.11414(b)(4)
40 CFR 63.11414(d)
40 CFR 63.11414(e)
40 CFR 63.11414(f)
40 CFR 63.11415(d)
40 CFR 63.11416(c)
40 CFR 63.11416(e)
40 CFR 63.11416(f)
40 CFR 63.11417(a),
40 CFR 63.11417(c)(1)
40 CFR 63.11417(d)
40 CFR 63.11418
40 CFR 63.11419
40 CFR 63.11420

Applicable portions of Table 1 of 40 CFR 63, Subpart OOOOOO

The requirements of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-66-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart OOOOOO.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules have been reviewed for applicability to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)
The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. The requirements of 326 IAC 2-3 (Emission Offset) will not be applicable to Toyota Boshoku America because it is not located in Montgomery Township in Gibson County.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAP is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

Boilers & Heaters

- (h) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 6-2-1(d), indirect heating facilities constructed after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4(a), which limits Particulate emissions from facilities with a maximum operating capacity of less than ten (10) million British thermal units per hour (MMBtu/hr) to six-tenths (0.6) pound of particulate matter per MMBtu (lb/MMBtu).
- (1) Pursuant to 6-2-4, particulate emissions from the boilers, identified as EU-03B-1 and EU-03B-2, shall each be less than 0.6 lb/MMBtu
- Based on AP-42 emission factors, and as shown in Appendix A, the potential to emit particulate from the two (2) boilers EU-03B-1 and EU-03B-2, is 0.01518 lb/MMBtu, each. Since 0.01518 lb/MMBtu is less than the allowable limit of 0.6 lb/MMBtu, both boilers, EU-03B-1 and EU-03B-2, will be able to comply with the requirements of 326 IAC 6-2-4(a) without the use of a control device.
- (2) The natural gas-fired space heater is not subject to 326 IAC 6-2 since it is not an indirect heating unit.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e)(1), no person shall operate any manufacturing process so as to produce, cause, suffer, or allow particulate to be emitted in excess of the amount specified in this subsection. The allowable rate of emissions shall be based on process weight rate for the manufacturing process.
- (1) Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired space heater is exempt from the requirements of 326 IAC 6-3, because it is not a manufacturing process and it has potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour.
- (j) 326 IAC 7-1 (Sulfur Dioxide Emission Limitations)
The natural gas-fired space heater and the two natural gas fired boilers (EU-03B-1, EU-03B-2) are not subject to the requirements of 326 IAC 7-1, because the actual and potential sulfur dioxide emissions from each unit are less than twenty-five (25) tons per year and less than ten (10) pounds per hour.

Welding

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e)(1), no person shall operate any manufacturing process so as to produce, cause, suffer, or allow particulate to be emitted in excess of the amount specified in this subsection. The allowable rate of emissions shall be based on process weight rate for the manufacturing process.

The pound per hour limitation was calculated with the following 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

- (1) The MIG welding stations (EU-01) use more than six hundred twenty-five (625) pounds of rod or wire per day and are, therefore, subject to the requirements of 326 IAC 6-3-2.

Process Weight Rate (ton/hr) =

$$\frac{(\text{Process Rate (unit/hr)} \times \text{vehicle weight (lb/unit)}) + (\text{Electrode Consumption (lb/hr)})}{2000 \text{ lb}}$$

Process Weight Rate (ton/hr) = (180 unit/hr x 100 lb/unit) + 234 lb/hr)/2000 lb

Process Weight Rate (ton/hr) = 9.12 ton/hr

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the MIG welding stations (EU-01) shall not exceed 18.03 pounds per hour when operating at a process weight rate of 9.12 tons per hour.

Hourly PM Emissions (lb/hr) = Electrode Consumption (lb/hr) x Emission Factor (lb PM /lb electrode)

Hourly PM Emissions (lb/hr) = 234 lb/hr x 0.0052 lb PM /lb electrode = 1.22 lb/hr

The hourly emission rate for the welding operations is 1.22 lb/hr which is less than the 18.03 lb/hr allowable emissions limit. Therefore, based on calculations, a control device is not needed to comply with this limit. (See Appendix A for calculations.)

Rust Inhibitor Booth

- (l) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls.
 - (1) Pursuant to 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 are not applicable to the metal surface coating operations in the Rust Inhibitor booth, since actual and potential VOC emissions are less than fifteen (15) pounds per day before add-on controls.

Polyurethane Foam Production

- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e)(1), no person shall operate any manufacturing process so as to produce, cause, suffer, or allow particulate to be emitted in excess of the amount specified in this subsection.
 - (1) The two (2) enclosed mold flexible polyurethane foam production lines, identified as EU-02A & EU-02B, are enclosed and do not emit particulates. Therefore, the requirements of 326 IAC 6-3-2 do not apply to these units.
- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6, facilities built after January 1, 1980, that have potential VOC emissions of twenty-five (25) tons or more per year; are located anywhere in the state; and are not otherwise regulated by other provisions of article 8; 326 IAC 20-48; or 326 IAC 20-56; shall reduce VOC emissions using the best available control technology (BACT).
 - (1) The new enclosed-mold flexible polyurethane foam production line (EU-02B), approved for construction in 2009, is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential VOC emissions from this new unit are less than twenty-five (25) tons per year.
 - (2) The existing enclosed-mold flexible polyurethane foam production line (EU-02A) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential VOC emissions from this unit are less than twenty-five (25) tons per year.

- (o) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-1, this rule applies to facilities constructed after July 1, 1990 located in any county, which coat any type of metal, with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls.
 - (1) No surface coating of metal parts takes place in the enclosed-mold flexible polyurethane foam production lines (EU-02A & EU-02B), therefore the requirements of 326 IAC 8-2-9 are not applicable to these facilities.
- (p) 326 IAC 8-2-11 (Volatile Organic Compounds, Fabric and Vinyl Coating)
The requirements of 326 IAC 8-2-11 are not applicable to this source, since this source does not perform surface coating of fabric or vinyl as defined by 326 IAC 8-2-11(a).
- (q) There are no other 326 IAC 8 Rules that are applicable to this source.
- (r) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

There are no testing or monitoring requirements.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 27, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 051-27983-00050. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5372 or toll free at 1-800-451-6027 extension 45372.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Summary**

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Application Date: May 27, 2009

Emission Unit	Emissions (tons/yr)							Total HAP
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	
Foam Production (EU-02A)	0.00	0.00	0.00	0.00	0.00	10.86	0.00	0
Foam Production (EU-02B) new	0.00	0.00	0.00	0.00	0.00	19.99	0.00	0
Rust Inhibitor Process (EU-03A)	0.00	0.00	0.00	0.00	0.00	0.95	0.00	0.28
Welding and Frame Assembly (EU-01) existing	1.33	1.33	1.33	0.00	0.00	0.00	0.00	0.03
Welding and Frame Assembly (EU-01) additional capacity	4.00	4.00	4.00	0.00	0.00	0.00	0.00	0.08
Natural Gas-Fired Combustion (EU-03B1, EU-03B2) + Space heater	0.06	0.25	0.25	0.02	3.32	0.18	2.78	0.06
Total	5.39	5.58	5.58	0.02	3.32	31.99	2.78	0.45

Highest Individual HAP = 0.11 ton/yr (Manganese)

SUMMARY of NEW/MODIFIED EMISSION UNITS

Emission Unit	Emissions (tons/yr)							Total HAP
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	
Foam Production (EU-02B) new	0.00	0.00	0.00	0.00	0.00	19.99	0.00	0.00
Welding and Frame Assembly (EU-01) additional capacity	4.00	4.00	4.00	0.00	0.00	0.00	0.00	0.08
Total	4.00	4.00	4.00	0.00	0.00	19.99	0.00	0.08

**Appendix A: Emissions Calculations
HAP**

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Application Date: May 27, 2009

Emission Unit	HAP Emissions (tons/yr)									
	Manganese	Formaldehyde	Nickel	Hexane	Benzene	Toluene	Ethyl Benzene	Xylene	Chromium	Lead
Foam Production (EU-02A)	0	0	0	0	0	0	0	0	0	0
Foam Production (EU-02B) new	0	0	0	0	0	0	0	0	0	0
Rust Inhibitor Process (EU-03A)	0	0	0	0	0	9.42E-02	9.42E-02	9.42E-02	0	0
Welding and Frame Assembly (EU-01) existing	2.66E-02	0	2.56E-04	0	0	0	0	0	2.56E-04	0
Welding and Frame Assembly (EU-01) additional	7.99E-02	0	7.69E-04	0	0	0	0	0	7.69E-04	0
Natural Gas-Fired Combustion (EU-03B1, EU-03B2) + Space heaters	1.26E-05	2.49E-03	6.96E-05	5.97E-02	6.96E-05	0	0	0	4.64E-05	1.66E-05
Total	0.10660	0.00249	0.00109	0.05967	0.00007	0.09416	0.09416	0.09416	0.00107	0.00002

Total HAP = 0.45
Highest Individual HAP = 0.11 (Manganese)

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

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Date: May 27, 2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.7

66.3

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5}	SO ₂	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.06	0.25	0.25	0.02	3.32	0.18	2.78

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

See page 2 for HAP emissions calculations.

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

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Date: May 27, 2009

HAP - Organics					
Emission Factors in lb/MMcf =	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr =	6.962E-05	3.978E-05	2.486E-03	5.967E-02	1.127E-04

HAP - Metals					
Emission Factors in lb/MMcf =	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr =	1.658E-05	3.647E-05	4.641E-05	1.260E-05	6.962E-05

Total HAP = 0.06
Highest single HAP (Hexane) = 0.06

Methodology is the same as page 1.

The five highest organic and metal HAP emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.

**Appendix A: Emissions Calculations
Foam Lines**

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Application Date: May 27, 2009

Emission Unit	Max. Potential Throughput (vehicle unit/hr)	Material	Usage Rate (g/unit)	Usage Rate (lb/unit)	wt% VOC	Potential VOC Emissions		VOC Emissions per day (lb/24 hr)
						lb/hr	ton/yr	
EU-02A (existing)	37.5	Polyol	3394	7.48	0%	0.00	0.00	59.53
		Isocyanate	2320	5.12	0%	0.00	0.00	
		Mold Release	300	0.66	10%	2.48	10.86	
EU-02B (new)	69	Polyol	3394	7.48	0%	0.00	0.00	109.54
		Isocyanate	2320	5.12	0%	0.00	0.00	
		Mold Release	300	0.66	10%	4.56	19.99	
Total New Unit (EU-02B) =						4.56	19.99	
Total Existing Unit (EU-02A) =						2.48	10.86	
Total Foam Lines =						7.04	30.86	

METHODOLOGY

Usage Rate (lb/vehicle unit) = Throughput (veh/hr) x Usage Rate (lb/veh) x 1 lb/453.53 g

Potential VOC Emissions (lb/hr) = Throughput (veh/hr) x Usage Rate (g/veh) x 1 lb/453.53 g x wt% VOC

Potential VOC Emissions (tons/yr) = Potential VOC Emissions (lb/hr) x 8760 hrs/yr x 1 ton/2000 lbs

Weight of 1 vehicle unit in the Foam Production line = 20 lbs.

These (EU-02A, EU-02B) are enclosed mold systems so there are no particulate emissions.

Notes: EU-02B is the proposed new polyurethane foam production line.
EU-02A has a maximum potential throughput of 37.5 vehicles per hour.

**Appendix A: Emissions Calculations
Welding**

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Application Date: May 27, 2009

Process MIG Welding units/hr	Electrode Consumption (lbs/unit)	Electrode Consumption (lb/hr)	Emissions (ton/yr)							Total HAP
			PM	PM ₁₀	PM _{2.5}	Mn*	Ni	Co	Cr	
			0.0052	0.0052	0.0052	2% of PM	1.00E-06	0	1.00E-06	
45	1.3	58.5	1.33	1.33	1.33	0.027	2.56E-04	0	2.56E-04	0.027
135	1.3	175.5	4.00	4.00	4.00	0.080	7.69E-04	0	7.69E-04	0.081
Welding Total Emissions (tons/yr) =			5.33	5.33	5.33	0.11	0.0010	0.00	0.0010	0.11
										Highest Single HAP (Manganese) = 0.11

Note: *Mn Emission Factor is 2% of PM/PM₁₀ emissions and is based on Manganese content from MSDS sheet

METHODOLOGY

The initial welding capacity was 45 units/hr. This permit application added the capacity to weld 135 unit/hr. Total capacity is now 180 units/hour. Electrode Emission Factors are in (lb of Pollutant/lb of Electrode).

Electrode Consumption (lbs/hr) = Process MIG Welding units/hr x Electrode Consumption (lbs/hr)

Emissions (tons/yr) = Electrode Consumption (lb/hr) x Emission Factor (lb/lb electrode) x 8760 hrs/yr x 1 ton/2,000 lbs

Mn Emissions (tons/yr) = PM/PM₁₀ Emissions (tons/yr) x % Mn

Total Daily Electrode Consumption (pounds) = Electrode Consumption (lb/hr) x 24 = 5616 lb/24 hr

Daily Individual MIG unit Electrode Consumption = Electrode Consumption (lb/hr) *24 = 31.2 lb/24 hr

Daily PM Emissions (lb/24 hr) = PM Emissions (ton/yr) x (2000 lb/ton) x (year/8760 hrs) = 29.20 lb/24 hr

Hourly PM Emissions (lb/hr) = Electrode Consumption (lb/hr) x Emission Factor (lb PM /lb electrode) = 1.22 lb/hr

Compliance - 326 IAC 6-3-2

Process	Process rate (unit/hr)	Process Weight Rate (ton/hr)	Allowable Emission Rate (lb/hr)	PM PTE (lb/hr)	Able to comply?
MIG welding	180	9.12	18.03	1.22	YES

METHODOLOGY

Process Weight Rate (ton/hr) = (Process Rate (unit/hr) x (vehicle unit weight (lb/unit) + Electrode Consumption (lb/hr)))/2000

Allowable Emission Rate (lb/hr) = 4.10 x (Process Weight Rate (ton/hr)^{0.67})

Weight of 1 vehicle unit in the Frame Welding process = 100 lbs.

Appendix A: Emissions Calculations Rust Inhibitor

Company Name: Toyota Boshoku America
Address City IN Zip: 667 West Gach Road, Princeton, Indiana 47670
Permit Number: M051-27983-00050
Reviewer: Sandra Carr
Application Date: May 27, 2009

Maximum Potential	
Hours of Operation	8760
Round Recliner, units/year	4,744,941.60
Round Recliner units/hr	541.66

Round Recliner Rust Inhibitor process

Material	Usage Rate grams/unit, RR	Usage Rate lb/unit	wt% content VOC	Round Recliner units/hr	wt% Xylene/ Toluene/ Ethyl Benzene, each	VOC (lb/unit)	PTE VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (tons/yr)	PTE HAP Xylene, Toluene, Ethyl Benzene each (tons/yr)
Rust Inhibitor-oil	1.8	0.00397	10%	541.66	1%	4.0E-04	0.21	5.16	0.94	0.094
Cleaning	0.01	0.00002	10%	541.66	0%	2.2E-06	0.001	0.03	0.005	0
Totals =							0.22	5.19	0.95	0.28

NOTES:

Rust Preventive Oil- Assumed 100% Aliphatic Hydrocarbon (worst Case) has 1% xylene, 1% Toluene, and 1% Ethyle Benzene
453.53 grams = 1 lb

Methodology

Usage Rate (lbs/unit) = [Usage Rate (grams/unit)] / [453.53 grams/lb]

VOC lbs/unit = Usage Rate (lbs/unit) * [Weight % VOCs]

PTE of VOC (lbs/hr) = [VOC (lbs/unit)] * [units/hr]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of HAP (tons/yr) = [PTE of HAP (lbs/hr)] * [(8760 hrs/yr)] * [1 ton/2000 lbs]



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

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

TO: Pat Summers
Toyota Boshoku America
RR1 Box 101
Princeton IN 47670

DATE: Sept. 4, 2009

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

SUBJECT: Final Decision
MSOP
051-27983-00050

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:
Jason Kellams Plant Mgr. Toyota Boshoku America
Holly Argiris ERM
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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. 4, 2009

TO: Princeton Public Library

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

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

Applicant Name: Toyota Boshoku America
Permit Number: 051-27983-00050

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 9/4/2009 Toyota Boshoku America 051-27983-00050 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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1		Pat Summers Toyota Boshoku America RR1 Box 101 Princeton IN 47670 (Source CAATS) <i>Via Confirmed Delivery</i>										
2		Jason Kellams Plant Mgr Toyota Boshoku America 667 W Gach Rd Preinceton IN 47670 (RO CAATS)										
3		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Princeton City Council and Mayors Office 603 South Main Street Princeton IN 47670 (Local Official)										
5		Princeton Public Library 130 S Hart St Princeton IN 47670-2198 (Library)										
6		Gibson County Health Department 800 S. Prince St., Courthouse Annex Princeton IN 47670-2664 (Health Department)										
7		Eric Anderson 25 Atlantic Avenue Erlanger KY 41018 (Affected Party)										
8		Gibson County Commissioners 101 N. Main Street Princeton IN 47670 (Local Official)										
9		Holly Argiris Environmental Resources Management (ERM) 11350 N. Meridian # 200 Fidelity Plaza, Tower 2 Carmel IN 46032 (Consultant)										
10		Mr. Bil Musgrove PO Box 520 Chandler IN 47610 (Affected Party)										
11		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
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