



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: November 6, 2008

RE: FlexForm Technologies, LLC / 039-28056-000516

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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Mr. Doug Evans
FlexForm Technologies, LLC
4955 Beck Drive
Elkhart, Indiana 46516

November 6, 2008

Re: Registration Notice-Only Change
No. R039-28056-000516

Dear Mr. Evans:

FlexForm Technologies, LLC was issued a Registration No. R039-25900-00516 on April 7, 2008, for a stationary non-woven mat production plant located at 4955 Beck Drive, Elkhart, Indiana 46516. On October 28, 2008, the Office of Air Quality (OAQ) received an application from the source relating to the replacement of a 3.3 MMBtu/hr natural gas-fired oven on the non-woven mat treating line with a new oil-heated compression roller oven (BOMBI) equipped with a 2.5 MMBtu/hr natural gas-fired oil heater. This replacement will not result in the replacement or repair of the entire non-woven mat treating line, does not qualify as a reconstruction of the entire non-woven mat treating line, and will not result in an increase of actual emissions. Therefore, this change to the registration is considered a notice-only change pursuant to 326 IAC 2-5.5-6(d)(11).

Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

A.2 Emission Units and Pollution Control Equipment Summary

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

- ...
- (e) ~~Two (2) Three (3)~~ natural gas-fired ovens with heat input rates of 2.2, ~~3.3~~ and 2 MMBtu per hour.
- ...
- (g) **One (1) oil-heated compression roller oven, identified as BOMBI, approved for construction in 2008, equipped with a natural gas-fired oil heater with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting through a roof stack.**

... SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- ...
- (e) ~~Two (2) Three (3)~~ natural gas-fired ovens with heat input rates of 2.2, ~~3.3~~ and 2 MMBtu per hour.
- ...
- (g) **One (1) oil-heated compression roller oven, identified as BOMBI, approved for construction in 2008, equipped with a natural gas-fired oil heater with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting through a roof stack.**
- ...

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration. A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Pam K. Way at (800) 451-6027, press 0 and ask for Pam K. Way or extension 4-4794 or dial (317) 234-4794.

Sincerely,

Original signed by

Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality

ACD/pkw

Attachment: Revised Registration

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Permits Administrative and Development
Billing, Licensing and Training Section



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REGISTRATION OFFICE OF AIR QUALITY

**FlexForm Technologies, LLC
4955 Beck Drive
Elkhart, Indiana 46516**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 039-25900-00516	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 7, 2008

Registration Notice-Only-Change No. 039-28056-00516	
Issued by:Original signed by Alfred C. Dumauual, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: November 6, 2008

SECTION A

SOURCE SUMMARY

This registration 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.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary non-woven mat production plant.

Source Address:	4955 Beck Drive, Elkhart, Indiana 46516
Mailing Address:	4955 Beck Drive, Elkhart, IN 46516
General Source Phone Number:	(574) 295-3777
SIC Code:	2299
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) A non-woven mat production plant, constructed in 1999 and modified in 2005, which has a maximum usage rate of 3,837 pounds of fibers per hour and using filters system which is considered an integral part of the process for particulate control. The production process involves blending, carding, crosslapping, needle punching, cutting and trimming. It also includes one (1) natural gas-fired pre-contact oven, with a heat input of 1 million British Thermal Units per hour (MMBtu/hr) and a second contact oven, with a heat input of 1 MMBtu/hr. The mat is used for side panels in cars.
- (b) One (1) non-woven mat production line, identified as no-heat production line #1, approved for construction in 2007, with a maximum usage rate of 1,100 pounds of fibers per hour, using filters system which is considered an integral part of the process for particulate control. The production process involves blending, air card fiber forming, needle punching, cutting and trimming.
- (c) One (1) non-woven mat treating line, identified as non-woven mat treating line #1, approved for construction in 2008, with a maximum throughput rate of 2,677 pounds of non-woven mat, 1070 pounds of powder per hour, and 908 pounds of liquid retardant treatment per hour, using dust collectors which are considered integral parts of the process for particulate control. The treating process involves milling, blending, curing, cooling, cutting, drying, and stacking on pallets.
- (d) One (1) storage silo, with a maximum storage capacity of 60,000 pounds of sodium borate, using a baghouse which is considered an integral part of the process for particulate control.
- (e) Two (2) natural gas-fired ovens with heat input rates of 2.2 and 2 MMBtu per hour.
- (f) Skids to store 2,000 bulk bags of heat set resin.
- (g) One (1) oil-heated compression roller oven, identified as BOMBI, approved for construction in 2008, equipped with a natural gas-fired oil heater with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting through a roof stack.

SECTION B GENERAL CONDITIONS

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

Terms in this registration 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 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration 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.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (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 registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 039-25900-00516 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (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 registration.
- (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 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.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) A non-woven mat production plant, constructed in 1999 and modified in 2005, which has a maximum usage rate of 3,837 pounds of fibers per hour and using filters system which is considered an integral part of the process for particulate control. The production process involves blending, carding, crosslapping, needle punching, cutting and trimming. It also includes one (1) natural gas-fired pre-contact oven, with a heat input of 1 million British Thermal Units per hour (MMBtu/hr) and a second contact oven, with a heat input of 1 MMBtu/hr. The mat is used for side panels in cars.
- (b) One (1) non-woven mat production line, identified as no-heat production line #1, approved for construction in 2007, with a maximum usage rate of 1,100 pounds of fibers per hour, using filters system which is considered an integral part of the process for particulate control. The production process involves blending, air card fiber forming, needle punching, cutting and trimming.
- (c) One (1) non-woven mat treating line, identified as non-woven mat treating line #1, approved for construction in 2008, with a maximum throughput rate of 2,677 pounds of non-woven mat, 1070 pounds of powder per hour, and 908 pounds of liquid retardant treatment per hour, using dust collectors which are considered integral parts of the process for particulate control. The treating process involves milling, blending, curing, cooling, cutting, drying, and stacking on pallets.
- (d) One (1) storage silo, with a maximum storage capacity of 60,000 pounds of sodium borate, using a baghouse which is considered an integral part of the process for particulate control.
- (e) Two (2) natural gas-fired ovens with heat input rates of 2.2 and 2 MMBtu per hour.
- (f) Skids to store 2,000 bulk bags of heat set resin.
- (g) One (1) oil-heated compression roller oven, identified as BOMBI, approved for construction in 2008, equipped with a natural gas-fired oil heater with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting through a roof stack.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes):

- (a) the allowable particulate emission rate from the existing non-woven mat production plant:
 - (i) shall not exceed 6.1 pounds per hour when operating at a maximum process weight rate of 1.82 tons per hour.
 - (ii) shall not exceed 0.88 pounds per hour when operating at a maximum process weight rate of 0.1 tons per hour.

- (b) the allowable particulate emission rate from the new non-woven mat production line (no-heat production line #1), shall not exceed 2.75 pounds per hour when operating at a maximum process weight rate of 0.55 tons per hour.
- (c) the allowable particulate emission rate from the silo filling shall not exceed 30.5 pounds per hour when operating at a maximum process weight rate of 20 tons per hour.
- (d) the allowable particulate emission rate from the mixed powder application of the non-woven mat treating line, shall not exceed 2.7 pounds per hour when operating at a maximum process weight rate of 0.54 tons per hour.

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

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

Compliance Determination Requirements

D.1.2 Particulate Matter (PM)

To comply with the Conditions D.1.1(a) - D.1.1(c), the baghouse and dust collectors which are considered integral parts of the processes shall be in operation at all times while the associate process is in operation.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	FlexForm Technologies, LLC
Address:	4955 Beck drive
City:	Elkhart, Indiana 46516
Phone #:	(574) 295-3777
MSOP #:	039-25900-00516

I hereby certify that FlexForm Technologies, LLC is :	<input type="checkbox"/> still in operation.
	<input type="checkbox"/> no longer in operation.
I hereby certify that FlexForm Technologies, LLC is :	<input type="checkbox"/> in compliance with the requirements of Registration 039-25900-00516.
	<input type="checkbox"/> not in compliance with the requirements of Registration 039-25900-00516.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
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: