



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
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Commissioner

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[www.idem.IN.gov](http://www.idem.IN.gov)

July 1, 2011

Mr. Greg Berry  
New NGC, Inc. dba National Gypsum Company  
9720 U.S. Highway 50 East  
Shoals, IN 47581

Re: Response to Review Request No. 101-30641-00003:  
Permit status evaluation  
Plant ID: 101-00003

Dear Mr. Berry:

New NGC, Inc. dba National Gypsum Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F101-22910-00003 on December 26, 2007 for a stationary gypsum wallboard manufacturing plant located at 9720 U.S. Highway 50 East, Shoals, Indiana. On February 26, 2009, the source was issued first Administrative Amendment No. 101-27342-00003 for the ability to utilize SILRES<sup>®</sup> BS94, a new silicone based raw material in the production of Extra Protection (XP) wallboard in the existing wallboard manufacturing operation. On July 30, 2009, the source was issued Minor Permit Revision No. 101-27980-00003, which included VOC emission limitations in the permit to limit the potential to emit VOC from the wallboard manufacturing operation to less than twenty-five (25) tons per 12 consecutive month period and in order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable. These limits were necessary because the source provided revised uncontrolled PTE calculations for pollutant VOC from the drying of XP wallboard in the natural gas-fired kiln dryer in the wallboard manufacturing operation based upon updated emission factors using stack testing results from a similar operation in Wilmington, North Carolina that exceeded twenty-five (25) tons per year to IDEM, OAQ. The source determined that the Regular and XP wallboard had the potential to emit VOC and HAPs when the wallboard is dried in the natural gas-fired kiln dryer and that the drying of XP wallboard in the natural gas-fired kiln dryer will now have the potential to emit 41.21 tons of VOC per year. Therefore, in order for the source to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, since the source had not begin production of the XP wallboard using SILRES<sup>®</sup> BS94 in the natural gas-fired kiln dryer they could still take limits to avoid the requirements of 326 IAC 8-1-6. On March 10, 2010, the source was issued second Administrative Amendment No. 101-28973-00003 for construction and operation of a new perlite system, which consists of a bulk bag unloader and integral filter receiver (air/perlite separator). On September 2, 2010 the source was issued third Administrative Amendment No. 101-29486-00003 that revised the testing language in the permit to indicate that the source will perform VOC testing no later than 180 days after initial use of any silicone based material since the source had been unable to XP wallboard using SILRES<sup>®</sup> BS94, a new silicone based raw material within the time frame originally specified for testing in Minor Permit Revision No. 101-27980-00003, issued on July 30, 2009.

On June 17, 2011, the source notified IDEM, OAQ, that they would like to use ammonium sulfate as a substitute for potash in the natural gas-fired kiln dryer, identified as Unit 2. In addition, the source would also like the flexibility of using both ammonium sulfate and potash in the kiln dryer in the future. The use of ammonium sulfate will not require any modifications to the existing equipment including the raw material conveyance systems or the board kilns. No new storage silos will be needed for ammonium sulfate. In addition, there will be no debottlenecking to the wallboard manufacturing operation when the source switches between ammonium sulfate and potash in the natural gas-fired kiln dryer. There is no increase in the PTE of particulate when using ammonium sulfate in place of potash because less ammonium sulfate is required compared to potash in the wallboard manufacturing operation. The use of ammonium sulfate does result in new emissions of ammonia; however, ammonia is not a regulated pollutant. Therefore, there are no changes that need to be made to Federally Enforceable State

Operating Permit (FESOP) Renewal No. F101-22910-00003, to allow the use of ammonium sulfate in the natural gas-fired kiln dryer.

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter to the front of the original permit. A copy of the permit 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](http://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 Sarah Conner, Ph. D., at (800) 451-6027, press 0 and ask for Sarah Conner, Ph. D. or extension 4-6555, or dial (317) 234-6555.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/slc

cc: File - Martin County  
U.S. EPA, Region V  
Martin County Health Department  
Compliance and Enforcement Branch

# Mail Code 61-53

IDEM Staff	LPOGOST 7/1/2011 New NGC Inc. dba National Gypsum Co. 101 - 30641 - 00003 Review Request)		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	

**CERTIFICATE OF MAILING ONLY**

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1		Greg Berry New NGC Inc. dba National Gypsum Co. 9720 US HWY 50 E Shoals IN 47581 (Source CAATS)										
2		Martin County Commissioners PO Box 600 129 S Main Street Courthouse Shoals IN 47581 (Local Official)										
3		Martin County Health Department P.O. Box 368 Shoals IN 47581-0368 (Health Department)										
4		Shoals Town Council P.O. Box 1078 Shoals IN 47581 (Local Official)										
5		Marjorie Collins ARCADIS U.S., Inc. 28550 Cabot Drive, Suite 500 Novi MI 48377 (Consultant)										
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