



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

TO: Interested Parties / Applicant

DATE: July 9, 2012

RE: Momentive / 033-31439-00075

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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

**Momentive**  
**420 N. Taylor Rd.**  
**Garrett, Indiana 46738**

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

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

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

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

Operation Permit No.: F033-31439-00075	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 9, 2012 Expiration Date: July 9, 2022

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>7</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>17</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

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

- C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 24**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 FESOP Limits [326 IAC 2-8]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Particulate Control
- D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions  
Determination

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

- D.1.7 Visible Emissions Notations
- D.1.8 Parametric Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 30**

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Certification Form .....	32
Emergency Occurrence Form .....	33
Quarterly Report Form, VOC emission limit, Mixing process 1 .....	35
Quarterly Report Form, VOC emission limit, Mixing process 2 .....	36
Quarterly Report Form, VOC emission limit, Mixing process 3 .....	37
Quarterly Report Form, VOC emission limit, Compounding .....	38
Quarterly Report Form, VOC emission limit, Mixing and Compounding.....	39
Quarterly Report Form, Total HAP emission limit, Mixing and Compounding.....	40
Quarterly Report Form, Individual HAP emission limit, Mixing and Compounding.....	41
Quarterly Deviation and Compliance Monitoring Report Form .....	42

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary customized and specialty silicone elastomers manufacturing operation.

Source Address:	420 N. Taylor Rd., Garrett, Indiana 46738
General Source Phone Number:	(260) 357-6161
SIC Code:	3069 (Fabricated Rubber Products)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

One (1) polydimethylsiloxane mixing operation consisting of:

- (a) One (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, equipped with an integral pneumatic bin filter system;
- (b) One (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, equipped with an integral pneumatic bin filter system;
- (c) One (1) mixing process, identified as Mixing Process #1, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (d) One (1) mixing process, identified as Mixing Process #2, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) transfer conveyor system; and
  - (3) One (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting

emissions outside the building;

- (e) One (1) mixing process, identified as Mixing Process #3, constructed prior to 2002 and modified in 2010, consisting of:
  - (1) Three (3) 2,200 pound raw material silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
  
- (f) One (1) batch mixing operation, identified as Compounding, including ten (10) mixing processes consisting of:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
  - (2) Three (3) mixers, identified as Mixer #4, Mixer #9, and Mixer #6 with nominal mixer volumes of 10, 25 and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #4, Mixer #9, and Mixer #6 were constructed prior to 2002.
  - (3) One (1) mixer with a nominal mixer volume of 300 gallons, identified as Mixer #8. Particulate emissions from this mixer are controlled by a baghouse identified as BH8, exhausting inside the building; Mixer # 8 was constructed in 2006. Mixing operations include a bag dump station and a bulk bag unloading unit.
  - (4) One (1) mixer with a nominal mixer volume of 500 gallons, identified as Mixer #10. Particulate emissions from this mixer are controlled by a baghouse identified as BH7, exhausting inside the building; Mixer #10 was constructed in 2003. Mixing operations include a 2,200 pound raw material storage silo, a bag dump station and a bulk bag unloading unit.
  - (5) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
  - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million

(10,000,000) Btu per hour. These gas-fired heaters are used to heat the building.

- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Closed loop heating and cooling systems.
- (e) Laboratory and research and development activities as defined in 326 IAC 2-7-1(21)(D).

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

- 
- (a) This permit, F033-31439-00075, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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- (a) All terms and conditions of permits established prior to F033-31439-00075 and issued pursuant to permitting programs approved into the state implementation plan have been either:

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

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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]

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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]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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- (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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

**C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP permit.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

One (1) polydimethylsiloxane mixing operation consisting of:

- (a) One (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, equipped with an integral pneumatic bin filter system;
- (b) One (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, equipped with an integral pneumatic bin filter system;
- (c) One (1) mixing process, identified as Mixing Process #1, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (d) One (1) mixing process, identified as Mixing Process #2, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) transfer conveyor system; and
  - (3) One (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (e) One (1) mixing process, identified as Mixing Process #3, constructed prior to 2002 and modified in 2010, consisting of:
  - (1) Three (3) 2,200 pound raw material silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (f) One (1) batch mixing operation, identified as Compounding, including ten (10) mixing processes consisting of:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
  - (2) Three (3) mixers, identified as Mixer #4, Mixer #9, and Mixer #6 with nominal mixer volumes of 10, 25 and 50 gallons respectively, with particulate

emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #4, Mixer #9, and Mixer #6 were constructed prior to 2002.

- (3) One (1) mixer with a nominal mixer volume of 300 gallons, identified as Mixer #8. Particulate emissions from this mixer are controlled by a baghouse identified as BH8, exhausting inside the building; Mixer # 8 was constructed in 2006. Mixing operations include a bag dump station and a bulk bag unloading unit.
- (4) One (1) mixer with a nominal mixer volume of 500 gallons, identified as Mixer #10. Particulate emissions from this mixer are controlled by a baghouse identified as BH7, exhausting inside the building; Mixer #10 was constructed in 2003. Mixing operations include a 2,200 pound raw material storage silo, a bag dump station and a bulk bag unloading unit.
- (5) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

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

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

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the VOC emissions from each of the four (4) mixing operations shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

#### **D.1.2 FESOP and PSD Limits [326 IAC 2-8] [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The individual HAP generating material input to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total HAP generating material input to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total VOC generating material input to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of VOC shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (d) The allowable PM10 and PM2.5 emission rate from each mixing process shall be limited as follows:

Unit ID / Description	Control Description	Limited PM10 (lbs/hr)	Limited PM2.5 (lbs/hr)
Mixer #1 (Mixing Process 1)	BH2	2.62	2.62
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
Mixer #11 (Compounding Operation)	BH3	2.65	2.65
LSR Mixer #1 (Compounding Operation)			
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

Compliance with the above limits, combined with the potential to emit PM10, PM2.5, VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, VOC to less than 100 tons per 12 consecutive month period each, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the following units shall be limited by the following:

Unit ID / Description	Control	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)
Mixer #1 (Mixing Process 1)	BH2	0.514	2.62
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
Mixer #11 (Compounding Operation)	BH3	0.523	2.65
LSR Mixer #1 (Compounding Operation)			
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			
Mixer #4 (Compounding Operation)	BH5	0.568	2.81
Mixer #6 (Compounding Operation)			
Mixer #9 (Compounding Operation)			
Mixer #10 (Compounding Operation)	BH7	0.750	3.38
Mixer #8 (Compounding Operation)	BH8	0.750	3.38
Untreated Fume Silica Storage Silo	Integral Bin Filter	0.750	3.38
Treated Fume Silica Storage Silo	Integral Bin Filter	0.750	3.38
Raw Material Storage Silos	NA	1.467	5.30

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the potential PM emissions from Compounding Mixer #11 and LSR Mixer 3 shall be less than 0.551 pounds per hour.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for mixing processes and the control devices identified as BH2 and BH3. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.5 Particulate Control

- (a) In order to comply with Conditions D.1.2(d) and D.1.3, the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when filler material is being added to a mixer or when filler material is being blended into a mix.
- (b) The integral pneumatic bin filter system that is associated with each silo shall be in operation and control emissions at all times when loading fume silica into the Treated Fume Silica Storage Silo and Untreated Fume Silica Storage Silo.

#### D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination

Compliance with Conditions D.1.1 and D.1.2 shall be determined by calculating the VOC and HAP emissions associated with each mixing operations using the following equations:

- (a) Compliance shall be determined by calculating the VOC emissions associated with each mixing operation using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total VOC emissions in tons  
i = Single VOC producing material  
P = Usage of VOC producing material in pounds  
EF = VOC generation rate for each VOC producing material (VOC generated per pound of ingredient) as determined by empirical calculations.

- (b) Compliance shall be determined by calculating the HAP emissions associated with each mixing operation using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total HAP emissions in tons  
i = Single HAP producing material  
P = Usage of HAP producing material in pounds

EF = HAP generation rate for each HAP producing material (pounds HAP) as determined by empirical calculations.

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

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

#### **D.1.7 Visible Emissions Notations**

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- (a) Daily visible emission notations of the baghouses identified as BH2 and BH3 shall be performed during normal daylight operations when the mixing processes 1, 2, and 3, and the Compounding Operation are in operation and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### **D.1.8 Parametric Monitoring**

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- (a) The Permittee shall record the pressure drop across the baghouses (identified as BH2 and BH3) used in conjunction with the mixing processes, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

#### **D.1.9 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available available no later than 30 days of the end of each compliance period.

- (1) The total weight of each VOC generating material used at each mixing process 1, 2, and 3, and the Compounding Operation each calendar month; and emissions of VOC each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used except as provided in paragraph (2) below.
  - (2) The total VOC generating material input and the emissions of VOC for each compliance period. If the combined emissions of VOC in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation).
  - (3) The total weight of each HAP generating material used by mixing processes 1, 2, and 3, and the Compounding Operation each calendar month; and emissions of individual and total HAPs each calendar month, as determined utilizing the equation specified in Condition D.1.6.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the baghouse (identified as BH2 and BH3) exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
  - (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the baghouses (identified as BH2 and BH3) used in conjunction with the mixing processes. The Permittee shall include in its daily record when a pressure a drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
  - (d) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document the compliance status with Condition D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) If the combined VOC emissions from the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation) including associated clean-up activities, are less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Conditions D.1.1 and D.1.2(c) using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall operate the degreasing operations in compliance with the following:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Momentive  
Source Address: 420 N. Taylor Rd., Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Momentive  
Source Address: 420 N. Taylor Rd., Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 1  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 2  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 3  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Compounding Operation  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to the Compounding Operation, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-31439-00075  
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation)  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the emissions of shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-31439-00075  
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation)  
 Parameter: Total HAP emissions  
 Limit: The total HAP emissions from the mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Momentive  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation)  
Parameter: The individual HAP emissions  
Limit: The individual HAP emissions from the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

Source Name: Momentive  
Source Address: 420 N. Taylor Rd., Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked No deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Momentive</b>
<b>Source Location:</b>	<b>420 N. Taylor Rd., Garrett, IN 46738</b>
<b>County:</b>	<b>DeKalb</b>
<b>SIC Code:</b>	<b>3069 (Fabricated Rubber Products)</b>
<b>Permit Renewal No.:</b>	<b>F033-31439-00075</b>
<b>Permit Reviewer:</b>	<b>Sarah Street</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Momentive relating to the operation of a stationary customized and specialty silicone elastomers manufacturing operation. On February 3, 2012, Momentive submitted an application to the OAQ requesting to renew its operating permit. Momentive was issued its first FESOP Renewal F033-22847-00075 on January 22, 2008.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

One (1) polydimethylsiloxane mixing operation consisting of:

- (a) One (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, equipped with an integral pneumatic bin filter system;
- (b) One (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, equipped with an integral pneumatic bin filter system;
- (c) One (1) mixing process, identified as Mixing Process #1, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (d) One (1) mixing process, identified as Mixing Process #2, constructed in 2002 and modified in 2010, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) transfer conveyor system; and
  - (3) One (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;

- (e) One (1) mixing process, identified as Mixing Process #3, constructed prior to 2002 and modified in 2010, consisting of:
  - (1) Three (3) 2,200 pound raw material silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
  
- (f) One (1) batch mixing operation, identified as Compounding, including ten (10) mixing processes consisting of:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
  - (2) Three (3) mixers, identified as Mixer #4, Mixer #9, and Mixer #6 with nominal mixer volumes of 10, 25 and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #4, Mixer #9, and Mixer #6 were constructed prior to 2002.
  - (3) One (1) mixer with a nominal mixer volume of 300 gallons, identified as Mixer #8. Particulate emissions from this mixer are controlled by a baghouse identified as BH8, exhausting inside the building; Mixer # 8 was constructed in 2006. Mixing operations include a bag dump station and a bulk bag unloading unit.
  - (4) One (1) mixer with a nominal mixer volume of 500 gallons, identified as Mixer #10. Particulate emissions from this mixer are controlled by a baghouse identified as BH7, exhausting inside the building; Mixer #10 was constructed in 2003. Mixing operations include a 2,200 pound raw material storage silo, a bag dump station and a bulk bag unloading unit.
  - (5) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

Note: Due to changes in naming conventions at the source, these unit descriptions may appear different from the most recent issued permit approval. The source also wished to re-order the emission unit list so that mixing processes are listed sequentially. Further, for Mixer #1 and Mixer #3, screw conveyors were replaced with pneumatic systems. The source has also added a new baghouse, BH8, installed on Mixer #8. This baghouse is located outside but vented indoors, and has no effect on the mixer capacity or process options. Lastly, Mixer #4's actual maximum capacity is 10 gallons, whereas it was previously listed as having a maximum capacity of 25 gallons. These changes do not affect potential to emit (PTE) calculations at the source.

### **Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
  - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. These gas-fired heaters are used to heat the building.
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Closed loop heating and cooling systems.
- (e) Laboratory and research and development activities as defined in 326 IAC 2-7-1(21)(D).

### **Existing Approvals**

Since the issuance of the FESOP First Renewal F033-22847-00075 on January 22, 2008, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. F033-25973-00075 issued on March 27, 2008; and
- (b) Administrative Amendment No. F033-29013-00075 issued on March 17, 2010; and
- (c) Administrative Amendment No. F033-30759-00075 issued on September 23, 2011.

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

### **Air Pollution Control Justification as an Integral Part of the Process**

- (a) Treated Fume Silica storage silo

For the source's First Renewal, the Permittee submitted information requesting that the pneumatic bin filter system for the one (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, be considered integral to the process. IDEM, OAQ evaluated the justifications and agreed that the pneumatic bin filter system will be considered integral to the process. This evaluation and approval was discussed in Renewal No. 033-22847-00075, issued on January 22, 2008.

- (b) Untreated Fume Silica storage silo

The Permittee has also submitted information requesting that the pneumatic bin filter system for the one (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, be considered integral to the process. IDEM, OAQ evaluated the justifications and agreed that the pneumatic bin filter system will be considered integral to the process.

This evaluation and approval was discussed in Administrative Amendment No. 033-29013-00075, issued on March 17, 2010.

Therefore, the permitting level will be determined using the potential to emit after the bin filters for both the Treated Fume Silica storage silo and the Untreated Fume Silica storage silo.

#### Enforcement Issue

There are no enforcement actions pending.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

Appendix A to this TSD reflects the unrestricted potential emissions of the source for non-confidential information, as well as relevant emissions limits outlined below. For the First Permit Renewal No. 033-22847-00075, issued January 22, 2008, Momentive claimed production information including the names and quantities of ingredients used, batch sizes, cycle times and production rates as confidential. IDEM, OAQ agreed with these claims of confidentiality in Technical Support Document (TSD) to Permit No. 033-22847-00075.

Momentive has determined that VOC and HAP emissions are created by a hydrolysis reaction and depend on the chemical composition of the raw material used in the production of specialty silicone elastomers. The VOC and HAP emission rate for each product will be calculated using the chemical composition of the raw materials. Emission rates are based on theoretical complete reactions. The PM emissions for these units were calculated using AP-42 emission factors and mass balance data submitted by the Permittee.

#### County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>

DeKalb County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

**Fugitive Emissions**

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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Unrestricted Potential Emissions</b>	
<b>Pollutant</b>	<b>Tons/year</b>
PM	Greater than 100, less than 250
PM <sub>10</sub>	Greater than 100, less than 250
PM <sub>2.5</sub>	Greater than 100, less than 250
SO <sub>2</sub>	Less than 100
VOC	Greater than 250
CO	Less than 100
NO <sub>x</sub>	Less than 100
GHGs as CO <sub>2</sub> e	Less than 100,000

<b>HAPs</b>	<b>tons/year</b>
Single HAP (Methanol)	Greater than 10
Total	Greater than 25

Appendix A to this TSD reflects the unrestricted potential emissions of the source for non-confidential information, as well as relevant emissions limits outlined below. For the First Permit Renewal No. 033-22847-00075, issued January 22, 2008, Momentive claimed production information including the names and quantities of ingredients used, batch sizes, cycle times and production rates as confidential. IDEM, OAQ agreed with these claims of confidentiality in Technical Support Document (TSD) to Permit No. 033-22847-00075. Part 70 permit level was determined in this previous approval, and the potential to emit (PTE) is not changing at the source in this Permit Renewal No. F033-31439-00075. The source will continue to limit all regulated criteria pollutants to less than Title V levels. Therefore, no unlimited potential to emit

(PTE) calculations are provided in the Appendix A to TSD for Permit Renewal No. 033-31439-00075 for confidential information.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM, PM10, PM2.5 and VOC are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued Federally Enforceable State Operating Permit (FESOP) Renewal (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP Renewal (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

<b>Potential to Emit After Issuance</b>
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The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)										
	PM	PM <sub>10</sub> * (1)	PM <sub>2.5</sub> ** (1)	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e***	Total HAPs	Worst Single HAP	
Mixer #1 (Mixing Process 1) (BH2)	66.71	11.49	11.49	-	-	<90.0 (2)	-	-	<24.0 (2)	<9.00 (2)	
Mixer #2 (Mixing Process 2) (BH2)				-	-		-	-			
Mixer #3 (Mixing Process 3) (BH2)				-	-		-	-			
Mixer #11 (Compounding Operation) (BH2)				-	-		-	-			
LSR Mixer #1 (Compounding Operation) (BH3)	45.81	11.61	11.61	-	-		-	-			-
LSR Mixer #2 (Compounding Operation) (BH3)				-	-		-	-			
LSR Mixer #3 (Compounding Operation) (BH3)				-	-		-	-			
LSR Mixer #4 (Compounding Operation) (BH3)				-	-		-	-			
Mixer #4 (Compounding Operation) (BH5)	4.98	4.98	4.98	-	-		-	-			-
Mixer #6 (Compounding Operation) (BH5)				-	-		-	-			
Mixer #9 (Compounding Operation) (BH5)				-	-		-	-			
Mixer #10 (Compounding Operation) (BH7)	6.57	6.57	6.57	-	-	-	-	-			
Mixer #8 (Compounding Operation) (BH8)	6.57	6.57	6.57	-	-	-	-	-			
Untreated Fume Silica Storage Silo (Integral Bin Filter)	0.09	0.09	0.09	-	-	-	-	-	-		
Treated Fume Silica Storage Silo (Integral Bin Filter)	0.09	0.09	0.09	-	-	-	-	-	-		
Raw Material Storage Silos	1.28	1.28	1.28	-	-	-	-	-	-		
Insignificant Combustion	0.08	0.08	0.08	0.03	4.38	0.24	3.68	5,288	0.08	0.08 Hexane	
<b>Total PTE of Entire Source</b>	<b>132.18</b>	<b>42.76</b>	<b>42.76</b>	<b>0.03</b>	<b>4.38</b>	<b>&lt;90.24</b>	<b>3.68</b>	<b>5,288</b>	<b>&lt;24.08</b>	<b>&lt;9.00</b>	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2</sub> e	NA	NA	

\*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".

\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

\*\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(1) PM10 and PM2.5 emissions for the batch mixers, conveyors, and material loading are limited by 326 IAC 6-3 and 3216 IAC 2-8-4 (FESOP). Unlimited PTE calculations are in an IDEM, OAQ confidential file. Baghouses BH3 and BH 5 are required to operate for control.

(2) Pursuant to 326 IAC 2-8-4 (FESOP), ingredient materials used by the four (4) mixing operations shall be limited such that emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year. These are existing requirements.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The input of each individual HAP generating material to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit source-wide individual HAP emissions to less than 10 tons per twelve (12) consecutive month period.

This is an existing requirement.

- (2) The total HAP generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit source-wide total HAP emissions to less than 25 tons per twelve (12) consecutive month period.

This is an existing requirement.

- (3) The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the total emissions of VOC from the mixing operations shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period.

The Permittee shall track the usage of compounds that will generate VOC and HAP emissions through hydrolysis during mixing operations. VOC and HAP emissions will be computed for these compounds by assuming that hydrolysis will release the maximum quantity of VOC and HAP possible, based upon the chemical composition of the material used. The Permittee shall maintain a list of materials used that will form VOC and HAP emissions during hydrolysis as well as the theoretical VOC and HAP emission rate for each such material.

- (a) Compliance shall be determined by calculating the VOC emissions associated with each mixing operation using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

- E = Total VOC emissions in tons
- i = Single VOC producing material
- P = Usage of VOC producing material in pounds
- EF = VOC generation rate for each VOC producing material (VOC generated per pound of ingredient) as determined by empirical calculations.

- (b) Compliance shall be determined by calculating the HAP emissions associated with each mixing operation using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

- E = Total HAP emissions in tons
- i = Single HAP producing material
- P = Usage of HAP producing material in pounds
- EF = HAP generation rate for each HAP producing material (pounds HAP) as determined by empirical calculations.

These are existing requirements.

- (4) The allowable PM10 and PM2.5 emission rates from each mixing process shall be limited as follows:

Unit ID / Description	Control Description	Limited PM10 (lbs/hr)	Limited PM2.5 (lbs/hr)
Mixer #1 (Mixing Process 1)	BH2	2.62	2.62
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
Mixer #11 (Compounding Operation)			
LSR Mixer #1 (Compounding Operation)	BH3	2.65	2.65
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

Note: Limits are specified by the control common to specific emissions units or processes. These FESOP Limits have been changed with this renewal. These changes include Title I changes.

To comply with these limits the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when solid material is being added to a mixing tank or when solid material is being blended into a mixing tank. The Permittee shall operate the control devices BH2 and BH3 in accordance with manufacturer's specifications.

Note: The potential to emit (PTE) calculations for PM were calculated based on mass balance emission factors (before control) submitted by the source to IDEM, determined in Technical Support Document to Permit No. 033-14394-00075, issued January 2, 2002,

Technical Support Document to Permit No. 033-18444-00075, issued February 11, 2004, and Technical Support Document to Permit No. 033-19559-00075, issued February 25, 2005.

Compliance with the above limits, combined with the potential to emit PM10, PM2.5, VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, VOC to less than 100 tons per 12 consecutive month period each, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) not applicable.

(b) PSD Minor Source

- (1) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the FESOP (326 IAC 2-8) limits for VOC, outlined above in the FESOP Applicability section.
- (2) The potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) Emission Offset Minor Source

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because DeKalb is an attainment county. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

<b>Federal Rule Applicability</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of NSPS for Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry (40 CFR Part 60, Subpart DDD) (326 IAC 12) are still not included in this permit because this source does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) as defined in 40 CFR 60.561.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (326 IAC 20-19) are still not included in this permit because the source does not manufacture an elastomer product as defined in 40 CFR 63.482.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (326 IAC 20-44) are still not included in this permit because this source is not one of the source categories specified in 40 CFR 63.1103(a) through (h). The source does not manufacture an acetal resins product as defined in 40 CFR 63.1103(a).

- (e) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (326 IAC 20-21) are still not included in this permit because this source does not manufacture a thermoplastic product as defined in 40 CFR 63.1312.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit renewal.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability - Entire Source</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)  
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is not subject to the requirements of 326 IAC 2-4.1, since the limited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (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)  
This source is located in DeKalb County. 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.

- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is located in Dekalb County and was constructed after December 13, 1985. However, the fugitive particulate emissions are negligible. Pursuant to 326 IAC 6-5-1(b), this source is exempt from the requirements of 326 IAC 6-5.

<b>State Rule Applicability – Individual Facilities</b>
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**Mixing Operations**

- (a) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the four (4) mixing operations (identified as Mixing Processes 1, 2, and 3, and the Compounding Operation), including their associated clean-up activities, shall be limited such that the VOC emissions from each facility shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(e), the particulate (PM) from the silicone elastomer production facilities listed in the table below shall be limited by the following:

	Unit ID / Description	Control	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	BH2	0.514	2.62
	Mixer #2 (Mixing Process 2)			
	Mixer #3 (Mixing Process 3)			
Compounding Operation	Mixer #11	BH3	0.523	2.65
	LSR Mixer #1			
	LSR Mixer #2			
	LSR Mixer #3			
	LSR Mixer #4	BH5	0.568	2.81
	Mixer #4			
	Mixer #6			
	Mixer #9			
	Mixer #10	BH7	0.750	3.38
	Mixer #8	BH8	0.750	3.38
Silos - Material Loading	Untreated Fume Silica Storage Silo	Integral Bin Filter	0.750	3.38
	Treated Fume Silica Storage Silo	Integral Bin Filter	0.750	3.38
	Raw Material Storage Silos	NA	1.467	5.30

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

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

To comply with these limits the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when solid material is being added to a mixing tank or when solid material is being blended into a mixing tank. The Permittee shall operate the control devices BH2 and BH3 in accordance with manufacturer's specifications.

Note: The control devices BH5, BH7, BH8 and each Bin Filter are not required to operate in order for these units to meet the emissions limitations required by 326 IAC 6-3-2. The Bin Filter on the Untreated Fume Silica storage silo and the Bin Filter on the Treated Fume Silica storage silo are each integral to the process.

Pursuant to 326 IAC 6-3-2(e)(2), the potential PM emissions from Compounding Mixer #11 and LSR Mixer #3 shall be less than 0.551 pounds per hour. The process weight rate for these emission units are less than 100 pounds per hour.

Note: The potential to emit (PTE) calculations for PM were calculated based on mass balance emission factors (before control) submitted by the source to IDEM, determined in Technical Support Document to Permit No. 033-14394-00075, issued January 2, 2002, Technical Support Document to Permit No. 033-18444-00075, issued February 11, 2004, and Technical Support Document to Permit No. 033-19559-00075, issued February 25, 2005.

### **Degreasing Operations**

(c) 326 IAC 8-3-2 (Cold Cleaner Operations)  
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(d) 326 IAC 8-3 (Degreaser Operations)  
Since the source operates two (2) cold cleaning degreasers that use a solvent containing VOC, were constructed after July 1, 1990, and are located in DeKalb County, the requirements of 326 IAC 8-3-5, Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control, are applicable.

The cold cleaner degreaser is not subject to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers) because it is not located in Clark, Floyd, Lake, or Porter County. The cold cleaner is not subject to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) because it does not have a remote solvent reservoir.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**Insignificant Combustion**

- (e) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
 The natural gas-fired combustion units are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Compliance Determination and Monitoring Requirements**

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

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

The compliance monitoring requirements applicable to this source are as follows:

<b>Control</b>	<b>Parameter</b>	<b>Frequency</b>	<b>Range</b>	<b>Excursions and Exceedances</b>
Baghouse dust collectors BH2 and BH3	Water Pressure Drop	Daily	2.0 and 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

The baghouse dust collectors identified as BH2 and BH3 shall be in operation at all times when mixing processes (identified as 1, 2, and 3) and the Compounding Operations are in operation. These monitoring conditions are necessary to comply with the limitations of 326 IAC 6-3-2 and 326 IAC 2-8. The Permittee shall also maintain a preventive maintenance plan.

The control devices BH5, BH7, BH8 and each Bin Filter are not required to operate in order for these units to meet the emissions limitations required by 326 IAC 6-3-2 and/or 326 IAC 8-2-4 (FESOP).

### Testing Requirements

Compliance testing is not required for mixing operations at this source because this permit includes record keeping and reporting requirements that will ensure compliance with VOC and HAP emission limitations.

Momentive has determined that VOC and HAP emissions are created by a hydrolysis reaction and depend on the chemical composition of the raw material used in the production of specialty silicone elastomers. The VOC and HAP emission rate for each product will be calculated using the chemical composition of the raw materials. Emission rates are based on theoretical complete reactions.

The PM emissions for these units were calculated using AP-42 emission factors and mass balance data submitted by the Permittee. IDEM considers these emission factors reliable.

This determination was made in Momentive's First Renewal No. 033-22847-00075, issued January 22, 2008.

### Recommendation

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

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

An application for the purposes of this review was received on February 3, 2012. Supplemental information was provided by the source on March 14, 2012 and on April 27, 2012. Momentive claimed production information including the names and quantities of ingredients used, batch sizes, cycle times and production rates as confidential. IDEM, OAQ agrees with these claims of confidentiality.

### Conclusion

The operation of this stationary customized and specialty silicone elastomers manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. F033-31439-00075.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Emissions Summary**

**Source Name:** Momentive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

Emission Unit	Control ID	Limited Potential to Emit (tons/yr)									
		PM*	PM10**	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Single HAP	Combined HAPs
Mixer #1 (Mixing Process 1)	BH2	66.71	11.49	11.49	-	-	<90	-	-	<9.00	<24.00
Mixer #2 (Mixing Process 2)					-	-		-	-		
Mixer #3 (Mixing Process 3)					-	-		-	-		
Mixer #11 (Compounding Operation)					-	-		-	-		
LSR Mixer #1 (Compounding Operation)	BH3	45.81	11.61	11.61	-	-		-	-		
LSR Mixer #2 (Compounding Operation)					-	-		-	-		
LSR Mixer #3 (Compounding Operation)					-	-		-	-		
LSR Mixer #4 (Compounding Operation)					-	-		-	-		
Mixer #4 (Compounding Operation)	BH5	4.98	4.98	4.98	-	-		-	-		
Mixer #6 (Compounding Operation)					-	-		-	-		
Mixer #9 (Compounding Operation)					-	-	-	-			
Mixer #10 (Compounding Operation)	BH7	6.57	6.57	6.57	-	-	-	-			
Mixer #8 (Compounding Operation)	BH8	6.57	6.57	6.57	-	-	-	-			
Untreated Fume Silica Storage Silo	Bin Filter <sup>(1)</sup>	0.09	0.09	0.09	-	-	-	-	-	-	-
Treated Fume Silica Storage Silo	Bin Filter <sup>(2)</sup>	0.09	0.09	0.09	-	-	-	-	-	-	-
Raw Material Storage Silos (Mixing Process 1, 2 & 3)	NA	1.28	1.28	1.28	-	-	-	-	-	-	-
Insignificant Combustion	NA	0.08	0.08	0.08	0.03	4.38	0.24	3.68	5,288	0.08 Hexane	0.08
<b>Total</b>		<b>132.18</b>	<b>42.76</b>	<b>42.76</b>	<b>0.03</b>	<b>4.38</b>	<b>&lt;90.24</b>	<b>3.68</b>	<b>5,288</b>	<b>&lt;9.00</b>	<b>&lt;24.08</b>

**Notes:**

\*PM emissions are limited by 326 IAC 6-3-2, and the process weight rates are considered confidential; therefore, the individual limitations are included in an IDEM, OAQ confidential file.

\*\*Limited PM10 and PM2.5 Potentials based on 326 IAC 6-3-2 allowable emission rates for Control BH2 and Control BH3.

Pursuant to 326 IAC 2-8-4 (FESOP), ingredient materials used by the four (4) mixing operations shall be limited such that emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year. This is an existing requirement.

(1) The Bin Filter is integral to the process for the Untreated Fume Silica silo; PTE determined after controls

(2) The Bin Filter is integral to the process for the Treated Fume Silica silo; PTE determined after controls

The PTE before all controls (including integral controls) is less than 250 tons per year of PM, PM10 and PM2.5

**Appendix A: Emission Calculations  
Mixers and Material Loading**

Source Name: Momenive  
 Source Address: 420 North Taylor Road, Garrett, IN 46738  
 Permit Number: F033-31439-00075  
 Plant ID: 033-00075  
 Permit Writer: Sarah Street  
 Date: 2/7/2012

**PM, PM10, PM2.5 Potential to Emit**

Unit ID / Description	Control	Unlimited PTE			Allowable PM Emissions (326 IAC 6-3-2)		FESOP Limited PM <sub>10</sub> , PM <sub>2.5</sub> **		Control Needed to Comply?	Controlled PM <sub>10</sub> , PM <sub>2.5</sub>									
		PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (lb/hr)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (lb/hr) by Control	PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (tons/yr) by Control	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)		(lbs/hr)	(tons/yr)								
Hot Base Mixers	Mixer #1 (Mixing Process 1)	5.55	15.23	66.71	2.62	11.49	2.62	11.49	YES	0.15	0.67								
	Mixer #2 (Mixing Process 2)	5.55																	
	Mixer #3 (Mixing Process 3)	3.75																	
Compounding Operation	Mixer #11	0.38	10.46	45.81	2.65	11.62	2.65	11.61	YES	0.10	0.46								
	LSR Mixer #1	8.00																	
	LSR Mixer #2	1.13																	
	LSR Mixer #3	0.20																	
	LSR Mixer #4	1.13																	
	Mixer #4	0.14																	
	Mixer #6	0.70										1.14	4.98	2.81	12.29	N/A	N/A	0.01	0.05
	Mixer #9	0.30																	
	Mixer #10	1.50																	
	Silos - Material Loading	Untreated Fume Silica Storage Silo <sup>(1)</sup>										2.25	2.25	9.86	3.38	14.81	N/A	N/A	0.02
Treated Fume Silica Storage Silo <sup>(1)</sup>		2.25																	
Raw Material Storage Silos		0.29	1.28	5.30	23.21	0.02	0.07												
						0.07	0.32												
		<b>Totals:</b>		<b>151.63</b>			<b>41.71</b>			<b>1.80</b>									

**Notes:**  
 Limits are specified by the control common to specific emissions units or processes.  
 Unlimited mixer emissions based on tested emission factor for process and batch size (lb/lb), cycle time, and maximum number of batches per day, which are considered confidential information.  
 Mixers have baghouse as control with 99% control efficiency  
 \*\*Limited PM10 and PM2.5 Potentials based on 326 IAC 6-3-2 allowable emission rates for Control BH2 and Control BH3.  
 (1) Treated and Untreated Fume Silica Storage Silos have controls integral to the process; PTE determined after control. Unlimited emissions considered for PSD applicability.  
 Raw Material Silos emission factor for large silos is 3.0 lb/ton based on AP-42 11.13, Table 11.13-2 (SCC 3-05-012-21)(Unloading and Conveying)  
 Raw Material Small Silos emission factor is 0.2 lb/ton based on AP-42 11.13, Table 11.13-2 (SCC 3-05-012-22)(Storage Bins)

**VOC Potential to Emit**

Unit ID / Description	Unlimited PTE				326 IAC 8-1-6 BACT Avoidance VOC Limit	FESOP & PSD Minor VOC Limit
	VOC emissions (lb/hr)	VOC emissions (tons/yr)	VOC emissions (lb/hr)	VOC emissions (tons/yr)	VOC emissions (tons/yr)	VOC emissions (tons/yr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	14.31	62.68	14.31	62.68	<25.00
	Mixer #2 (Mixing Process 2)	14.31	62.68	14.31	62.68	<25.00
	Mixer #3 (Mixing Process 3)	8.59	37.62	8.59	37.62	<25.00
Compounding Operation	Compounding Mixer #11	0.72	3.15	43.52	190.62	<25.00
	LSR Mixer #1	14.31	62.68			
	LSR Mixer #2	1.43	6.26			
	LSR Mixer #3	0.29	1.27			
	LSR Mixer #4	1.43	6.26			
	Mixer #4	0.29	1.27			
	Mixer #6	1.43	6.26			
	Mixer #9	0.72	3.15			
	Mixer #10	14.31	62.68			
	Mixer #6	8.59	37.62			
<b>Total:</b>	<b>80.73</b>	<b>353.60</b>	<b>80.73</b>	<b>353.60</b>		

**Appendix A: Emission Calculations  
Mixers and Material Loading**

**Source Name:** Momenive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

**PM Limits - 326 IAC 6-3-2 Particulate Emission Limitations for Manufacturing Processes**

	Unit ID / Description	Control	Process Weight Rate (lbs/hour)	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)	Allowable Rate of Emissions (tons/yr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	BH2	1,027.5	0.514	2.62	11.49
	Mixer #2 (Mixing Process 2)					
	Mixer #3 (Mixing Process 3)					
Compounding Operation	Mixer #11	BH3	1,045.0	0.523	2.65	11.62
	LSR Mixer #1					
	LSR Mixer #2					
	LSR Mixer #3					
	LSR Mixer #4	BH5	1,135.0	0.568	2.81	12.29
	Mixer #4					
	Mixer #6					
	Mixer #9	BH7	1,500.0	0.750	3.38	14.81
	Mixer #10					
	Silos - Material Loading	Mixer #8	BH8	1,500.0	0.750	3.38
Untreated Fume Silica Storage Silo		Integral Bin Filter	1,500.0	0.750	3.38	14.81
Treated Fume Silica Storage Silo		Integral Bin Filter	1,500.0	0.750	3.38	14.81
Raw Material Storage Silos		NA	2,933.0	1.467	5.30	23.21
						<b>117.85</b>

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

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

**Appendix A: Emission Calculations  
Mixer and Conveyor FESOP Permit Limits**

**Source Name:** Momenive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

**Old limits in prior permit approvals:**

Unit ID / Description	Control Description	Limited PM10, PM2.5 (lbs/hr) (tons/yr)	
Mixer #1 (Mixing Process 1)	BH2	1.15	5.04
Mixer #2 (Mixing Process 2)	BH2	1.15	5.04
Mixer #3 (Mixing Process 3)	BH2	0.89	3.90
Mixer #4 (Compounding Operation)	BH5	0.51	2.23
Mixer #6 (Compounding Operation)	BH5	1.52	6.66
Mixer #8 (Compounding Operation)	BH8	4.03	17.65
Mixer #9 (Compounding Operation)	BH5	0.86	3.77
Mixer #10 (Compounding Operation)	BH7	6.42	28.12
Mixer #11 (Compounding Operation)	BH2	0.54	2.37
LSR Mixer #1 (Compounding Operation)	BH3	1.66	7.27
LSR Mixer #2 (Compounding Operation)	BH3	0.45	1.97
LSR Mixer #3 (Compounding Operation)	BH3	0.55	2.41
LSR Mixer #4 (Compounding Operation)	BH3	0.45	1.97
Silos - Material Loading	Bin Filter	2.54	11.13
<b>99.51</b>			

The above table was the limited PTE based on 326 IAC 2-8-4 permit limits found within Operating Permit F033-31439-00075. However, upon further evaluation, limits are going to be specified for the common control for different processes. See table below.

Unit ID / Description	Control Description	Limited PM10, PM2.5 (lbs/hr) (tons/yr)		
Mixer #1 (Mixing Process 1)	BH2	2.62	11.49	
Mixer #2 (Mixing Process 2)				
Mixer #3 (Mixing Process 3)				
Mixer #11 (Compounding Operation)	BH3	2.65	11.61	
LSR Mixer #1 (Compounding Operation)				
LSR Mixer #2 (Compounding Operation)				
LSR Mixer #3 (Compounding Operation)				
LSR Mixer #4 (Compounding Operation)	BH5	4.47	19.58	Unlimited
Mixer #4 (Compounding Operation)				
Mixer #6 (Compounding Operation)				
Mixer #9 (Compounding Operation)	BH7	4.47	19.58	Unlimited
Mixer #10 (Compounding Operation)				
Mixer #8 (Compounding Operation)				
Untreated Fume Silica Storage Silo	Integral Bin Filter			
Treated Fume Silica Storage Silo	Integral Bin Filter			
Raw Material Storage Silos	N/A			
<b>42.68</b>				

Note: Limits are specified by the control common to specific emissions units or processes.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**Source Name:** Momentive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

Heat Input Capacity MMBtu/hr	HHV $\frac{\text{mmBtu}}{\text{mmscf}}$	Potential Throughput MMCF/yr
10.0	1000	87.6

Multiple natural gas fired heaters

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.1	0.3	0.3	0.0	4.4	0.2	3.7

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 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 of Gas  
 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/1,000 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See following page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
HAPs Emissions**

**Source Name:** Momentive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

HAPs - Organics					
Emission Factor 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	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

HAPs - Metals					
Emission Factor 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	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Methodology is the same as previous page

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See following page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Greenhouse Gas Emissions**

**Source Name:** Momentive  
**Source Address:** 420 North Taylor Road, Garrett, IN 46738  
**Permit Number:** F033-31439-00075  
**Plant ID:** 033-00075  
**Permit Writer:** Sarah Street  
**Date:** 2/7/2012

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	5,256	0.1	0.1
Summed Potential Emissions in tons/yr	5,256		
CO2e Total in tons/yr	5,288		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$   
 $CO2e (tons/yr) = CO2 Potential Emission ton/yr \times CO2 GWP (1) + CH4 Potential Emission ton/yr \times CH4 GWP (21) + N2O Potential Emission ton/yr \times N2O GWP (310).$



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

TO: Stan Schmidt  
Momentive  
420 N. Taylor Rd  
Garrett, IN 46738

DATE: July 9, 2012

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

SUBJECT: Final Decision  
FESOP - Renewal  
033-31439-00075

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:  
Robert McQueen (Manufacturing Manager)  
David Jordan (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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

July 9, 2012

TO: Garrett Public Library

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

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

**Applicant Name: Momentive**  
**Permit Number: 033-31439-00075**

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

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2		Robert W McQueeney Manufacturing Mgr Momentive 420 N Taylor Rd Garrett IN 46738 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
6		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
7		Mr. Dave Weilbaker 1423 Urban Ave Auburn IN 46706 (Affected Party)										
8		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
9		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
10		Garrett Public Library 107 W Houston Garrett IN 46738-1494 (Library)										
11		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
12		David Jordan Environmental Resources Management (ERM) 11350 North Meridian, Suite 320 Carmel IN 46032 (Consultant)										
13		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
14		Garrett City Council and Mayors Office P.O. Box 332, 130 S Randolph Garrett IN 46738 (Local Official)										
15												

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