



# 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: December 21, 2012

RE: Creative Foam Medical Systems / 099-31487-00033

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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Creative Foam Medical Systems  
405 North Industrial Drive  
Bremen, Indiana 46506**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-31487-00033	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 21, 2012 Expiration Date: December 21, 2017

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary vinyl-coated foam product manufacturing source.

Source Address:	405 North Industrial Drive, Bremen, Indiana 46506
General Source Phone Number:	219-546-4238
SIC Code:	3069
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) natural gas fired air makeup unit, capacity: 5.0 million British thermal units per hour.
  - (2) One (1) natural gas fired air makeup unit, capacity: 1.75 million British thermal units per hour.
  - (3) One (1) natural gas fired air makeup unit, capacity: 7.5 million British thermal units per hour.
  - (4) Four (4) natural gas fired heaters, capacity: 0.2 million British thermal units per hour, each.
  - (5) Two (2) natural gas fired office heaters, capacity: 1.0 million British thermal units per hour, each.
- (b) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and toluene. [40 CFR 63, Subpart OOOOOO]
- (c) The following foam processing operations, each with a maximum throughput less than one hundred (100) pounds per hour:
  - (1) Four (4) presses.
  - (2) One (1) slicer.
  - (3) One (1) blanker.
  - (4) One (1) buffing booth.
  - (5) One (1) saw cutter.
  - (6) Two (2) saws.
  - (7) One (1) C&C contour saw.
  - (8) One (1) hand contour saw.
  - (9) Two (2) fusion mold ovens.
  - (10) One (1) compression form oven.
  - (11) One (1) compression form press.
  - (12) One (1) fusion mold press.
  - (13) One (1) infrared oven.
- (d) One (1) cutting table, with a maximum throughput less than one hundred (100) pounds of plastic or cardboard per hour.
- (e) Two (2) C & C routers, equipped with a baghouse, each with a maximum throughput less than one hundred (100) pounds of PVC or wood per hour.
- (f) One (1) FDM 3D printer, constructed in 2011, operating a Fortus MC 3D printer, maximum throughput 0.0625 pounds of StrataSys PC-ISO per hour.

- (g) One (1) vinyl radio frequency (RF) Welder, identified as RFW1, constructed in 2011, operating a Callanan 30x48 Welder, capacity: 8 pounds of material per hour.
- (h) One (1) roll-coater, constructed in 2008, operating a Ttarp Laminator, capacity: 0.95 feet of 3M Adhesive Transfer Tape per hour.
- (i) One (1) foam die-cutter, constructed in 2011, operating a 150 Ton Schwabe Press, capacity: 40 pounds of foam per hour.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

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- (a) This permit, T099-31487-00033, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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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 2-7-7] [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 2-7-5(5)]

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

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- (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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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- (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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-7-5(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T099-31487-00033 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

#### **C.7 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

##### **C.8 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 2-7-5(1)][326 IAC 2-7-6(1)]**

##### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]**

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- (a) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
- (a) *CAM Response to excursions or exceedances.*
    - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
    - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
  - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while

providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:  
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
  - (1) Failed to address the cause of the control device performance problems;  
or
  - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
  - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
  - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for

expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]  
[40 CFR 64][326 IAC 3-8]

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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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed

and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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.18 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 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]: Surface Coating

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

- (a) Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), Processes 2, 3 and 4, and Areas 2 and 3 shall use the following Best Available Control Technology (BACT).
  - (1) A catalytic oxidizer shall be used at all times when Process 2, Process 3 or Process 4 is in operation except as specified in Condition D.1.1(a)(5). When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every five (5) years for overall control efficiency using methods approved by the Commissioner.
  - (2) Only dip coating shall be used at Process 2.
  - (3) Airless or high volume, low pressure (HVLP) spray guns or an application with a higher transfer efficiency shall be used at all spray applications. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10)

pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (4) The maximum VOC content of all coatings used shall not exceed 6.98 pounds per gallon of coating less water.
  - (5) Pursuant to 326 IAC 8-1-2(a)(2), the catalytic oxidizer is not required to be in operation during the months of November, December, January, February, and March.
- (b) The one (1) roll coater, identified as Process 5, shall use less than a total of twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 (New facilities: general reduction requirements) and 326 IAC 2-2, PSD, not applicable to the one (1) roll coater, identified as Process 5.

#### D.1.2 PSD Minor Limits [326 IAC 2-2]

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- (a) The VOC usage at the one (1) dip room (Process 2), the one (1) final finish area (Process 3), the one (1) mixing process (Process 4), one (1) roll coater (Process 5), one (1) assembly area (Area 2), and one (1) final finish area (Area 3), shall be limited such that the total emissions from those processes are less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This limits the potential to emit VOC from the source, to less than 250 tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.

- (b) PM and PM<sub>10</sub> emissions from Booths 3a and 3b at Process 3 shall be limited to fifty-four and three tenths (54.3) pounds per hour. This limits the potential to emit PM and PM<sub>10</sub> from the existing source to less than two hundred fifty (250) tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.
- (c) The total VOC emissions from the two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3, shall not exceed 40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limits the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than forty (40) tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.
- (d) PM and PM<sub>10</sub> emissions from the two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3, shall be limited to three and forty-two hundredths (3.42) pounds per hour. This limits the potential to emit PM and PM<sub>10</sub> from the two (2) hand-spray booths constructed in 2005 to less than fifteen (15) tons per year, and renders the requirements of 326 IAC 2-2, PSD, not applicable.
- (e) PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from booth 3a and 3b, shall not exceed 2.62 pounds per hour, each. Compliance with these limits, combined with the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from all other emission units at the source, shall limit the source-wide potential to emit of non-fugitive PM, PM<sub>10</sub>, and PM<sub>2.5</sub> to less than 250 tons per year, each, and renders the the source minor under 326 IAC 2-2, PSD

#### D.1.3 Particulate [326 IAC 6-3-2(d)]

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating at Process 3 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.4 HAPs Limit [326 IAC 2-4.1-1] [40 CFR 63]

---

- (a) The combined total emissions of each individual HAP from Process 2, Process 3, Process 4, Process 5, Area 2 and Area 3 shall not exceed 9.82 tons per twelve (12) consecutive month period.

Compliance with above limit in conjunction with individual HAP emissions from other units at the source shall limit the source-wide individual HAP emissions to less than 10 tons per year. Therefore, this source is an area source under NESHAP.

Compliance with above limit shall restrict individual HAP emissions from process 5 to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-4.1, New Source Toxics Control, are not applicable to the one (1) roll coater (Process 5).

- (b) Combined total HAP emissions from Process 2, Process 3, Process 4, Process 5, Area 2 and Area 3 shall not exceed 24.7 tons per twelve (12) consecutive month period.

Compliance with above limit in conjunction with total HAPs emissions from other units at the source shall limit the source-wide total HAPs emissions to less than 25 tons per year. Therefore, this source is considered as area source under NESHAP.

Compliance with above limit shall restrict total HAPs emissions from process 5 to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-4.1, New Source Toxics Control, are not applicable to the one (1) roll coater (Process 5).

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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A Preventive Maintenance Plan, is required for these facilities and their control devices. 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.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Control

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- (a) In order to comply with Conditions D.1.2(a), D.1.2(c), and D.1.4, the catalytic oxidizer, identified as Oxidizer #1, shall be in operation and control emissions from Processes 2, 3 and 4, at all times when Processes 2, 3 and/or 4 are in operation during the months of April through October.
- (b) During the months of November through March, if the Oxidizer #1 is in operation and controlling emissions from any associated emission unit to comply with Conditions D.1.2(a), D.1.2(c), and D.1.4, the the Oxidizer #1 shall be in operation and control emissions from all the associated emission units that are in operation.

#### D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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- (a) In order to demonstrate compliance status with Conditions D.1.1(a)(1), D.1.2(a) and (c), not later than five (5) years of the most recent testing performed on catalytic oxidizer, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every five (5) years for overall control efficiency using methods approved by the Commissioner. Section C – Performance Testing contains the Permittee's obligation with regard to this requirement.
- (b) In order to demonstrate compliance status with Condition D.1.5, within five (5) years of the most recent testing performed on catalytic oxidizer, the Permittee shall perform inlet and outlet HAP testing of the catalytic oxidizer, utilizing Method 18 or other methods as

approved by the Commissioner, for toluene or the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every five (5) years. Section C – Performance Testing contains the Permittee's obligation with regard to this requirement.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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The VOC content and usage (in order to determine the compliance with the conditions D.1.1 and D.1.2(a) and (c), and D.1.3(a)) and HAP content and usage (in order to determine the compliance with the condition D.1.4) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 2-7-6(6)]

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(a) In order to determine compliance with Condition D.1.2(a), the VOC emissions shall be calculated as follows:

VOC emissions from Processes 2, 3, 4, and 5, and Areas 2 and 3 = A + B + C

Where,

A = VOC usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at process 2, booths 3a and 3b, process 4 when Oxidizer #1 is in operation x {1 - [VOC control efficiency of Oxidizer #1 as determined from the most recent testing (%) / 100]}

B = VOC usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Processes 2, 3, and 4 when Oxidizer #1 is not in operation.

C = VOC usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Area 2, Area 3, and Process 5.

(b) In order to determine compliance with Condition D.1.2(c), the total VOC emissions shall be calculated as follows:

Total VOC emissions from Booths 3c and 3d = A + B

Where,

A = VOC usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Booths 3c and 3d when Oxidizer #1 is in operation x {1 - [VOC control efficiency of Oxidizer #1 as determined from the most recent testing (%) / 100]}

B = VOC usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Booths 3c and 3d when Oxidizer #1 is not in operation.

D.1.10 Hazardous Air Pollutants [326 IAC 2-7-6(6)]

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(a) In order to determine compliance with Condition D.1.4(a), the combined total emissions of each individual HAP shall be calculated as follows:

Individual HAP emissions from Processes 2, 3, 4, and 5, and Area 2 and 3 = A + B + C

Where,

A = Individual HAP usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Process 2, Process 3, Process 4 when Oxidizer #1 is in operation  $\times \{1 - [\text{Individual HAP control efficiency of Oxidizer \#1 as determined from the most recent testing (\%)} / 100]\}$

B = Individual HAP usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Processes 2, 3, and P 4 when Oxidizer #1 is not in operation.

C = Individual HAP usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Area 2, Area 3, and Process 5.

- (b) In order to determine compliance with Condition D.1.4(b), the total HAPs emissions shall be calculated as follows:

Combined total HAP emissions from Processes 2, 3, 4, and 5, and Area 2 and 3 = A + B + C

Where,

A = Total HAPs usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Processes 2, 3, and 4 when Oxidizer #1 is in operation  $\times \{1 - [\text{Total HAP control efficiency of Oxidizer \#1 as determined from the most recent testing (\%)} / 100]\}$

B = Total HAPs usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Processes 2, 3, and 4 when Oxidizer #1 is not in operation.

C = Total HAPs usage (including coatings, dilution solvents, and cleaning solvents) in tons per twelve (12) consecutive month period at Area 2, and Area 3, and Process 5.

#### D.1.11 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Conditions D.1.2(b), D.1.2(d), and D.1.2(e), the dry filters for particulate control shall be in operation and control emissions from the associated coating operation at all times that the associated coating operation is being performed.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.12 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one (1) or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursion 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.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursion 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.1.13 Parametric Monitoring [40 CFR 64]

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- (a) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit, or whichever is the greater operating temperature from (i) and (ii) below.
  - (i) The temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC.
  - (ii) The temperature determined in the most recent stack test for HAPs.

The Permittee shall take appropriate response steps whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. 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.

- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the limits in Conditions D.1.1(a)(1), D.1.2(a) and (c), and D.1.4.
- (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in the most recent compliant 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 reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The parametric monitoring in (a) and (c) above are not applicable to the catalytic oxidizer when it is not operating during the months of November, December, January, February, and March.

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

##### D.1.14 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1, D.1.2(a) and (c), the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1, D.1.2(a) and (c).
  - (1) The VOC content of each coating material and solvent used.

- (2) The amount of each coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The total VOC usage for each month at each booth when the catalytic oxidizer is in operation.
  - (5) The total VOC usage for each of the months from November, December, January, February, and March at each booth when the catalytic oxidizer is not in operation.
  - (6) The records of the duration in hours for the months of November, December, January, February, and March during which the catalytic oxidizer is not in operation.
  - (7) The total weight of VOCs emitted for each month and compliance period.
- (b) To document the compliance status with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs limits established in Condition D.1.4.
- (1) The HAP content of each coating material and solvent used.
  - (2) The amount of each coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total usage of each individual HAP and total HAPs for each month at each booth when the catalytic oxidizer is in operation.
  - (4) The total individual HAP and total HAPs usage for each of the months from November, December, January, February, and March at each booth when the catalytic oxidizer is not in operation.
  - (5) The records of the duration in hours for the months of November, December, January, February, and March during which the catalytic oxidizer is not in operation.
  - (6) The weight of each individual HAP and total HAPs emitted for each month and compliance period.
- (c) To document the compliance status with Condition D.1.11, the Permittee shall maintain a

log of weekly overspray observations, and daily and monthly inspections.

- (d) To document the compliance status with Conditions D.1.1(a)(1), D.1.2(a) and (c), D.1.4 and D.1.13(a), the Permittee shall maintain continuous records of the internal combustion zone temperature of the catalytic oxidizer. The Permittee shall include in the record documentation of times when the temperature is not recorded and the reason for the lack of a record (e.g., Processes 2, 3, and 4 are not operating).

Such records are not required for the periods in the months of November, December, January, February, and March when the catalytic oxidizer is not in operation. The Permittee shall keep the record of the log of the dates when the catalytic oxidizer is not in operation.

- (e) To document the compliance status with Conditions D.1.1(a)(1), D.1.2(a) and (c), D.1.4 and D.1.13(c), the Permittee shall maintain records of the duct pressure or fan amperage of the catalytic oxidizer. The Permittee shall include in the record documentation of times when the duct pressure or fan amperage is not recorded and the reason for the lack of a record (e.g., Processes 2, 3, and 4 are not operating).

Such records are not required for the periods in the months of November, December, January, February, and March when the catalytic oxidizer is not in operation. The Permittee shall keep the record of the log of the dates when the catalytic oxidizer is not in operation.

- (f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.15 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(b), D.1.2(a) and (c), and D.1.4 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 reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).

## SECTION E.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]: Polyurethane Foam Operations

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (b) One (1) mixing process, identified as Process 4, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 12,671 pounds of coatings mixed per hour.
- (c) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (d) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour
- (e) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of four (4) hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (f) One (1) Roll Coater, identified as Process 5, constructed in 1998, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

#### Insignificant Activities:

- (b) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and Toluene.

Under 40 CFR 63, Subpart OOOOOO, these units are considered affected facilities.

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

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

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

- (a) Pursuant to 40 CFR 63.11419, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions as specified in Table 1 of 40 CFR Part 63, Subpart OOOOOO.
- (b) Pursuant to 40 CFR 63.11417, the Permittee shall submit all required notifications and reports to:

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

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
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**  
**Part 70 Quarterly Report**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033  
Facility: Process 5  
Parameter: VOC usage  
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**Part 70 Quarterly Report**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033  
Facilities: Two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3  
Parameter: VOC emissions  
Limit: 40 tons per twelve (12) consecutive month period

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

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**Part 70 Quarterly Report**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033  
Facilities: Processes 2, 3, 4 and 5, and Areas 2 and 3  
Parameter: total VOC emissions  
Limit: Less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**Part 70 Quarterly Report**

Source Name: Creative Foam Medical Systems  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T099-31487-00033  
Facilities: Processes 2, 3, 4, and 5, and Areas 2 and 3  
Parameter: total worst-case individual HAP emissions  
Limit: Less than 9.82 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Worst-case individual HAP emissions (tons)	Worst-case individual HAP emissions (tons)	Worst-case individual HAP emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 Part 70 Quarterly Report**

Source Name: Creative Foam Medical Systems  
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T099-31487-00033  
 Facilities: Processes 2, 3, 4, and 5, and Areas 2 and 3  
 Parameter: Total HAP emissions  
 Limit: Less than 24.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Total HAP emissions (tons)	Total HAP emissions (tons)	Total HAP emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Creative Foam Medical Systems  
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T099-31487-00033

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

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".	
<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: \_\_\_\_\_

**Attachment A to a Part 70 Operating Permit Renewal No. T099-31487-00033**

Creative Foam Medical Systems  
405 North Industrial Drive, Bremen, Indiana 46506

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

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

Applicability and Compliance Dates

§ 63.11414 Am I subject to this subpart?

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

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

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

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

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

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

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

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

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

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

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

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

### § 63.11415 What are my compliance dates?

- (a) If you own or operate an existing slabstock flexible polyurethane foam production affected source, you must achieve compliance with the applicable provisions in this subpart by July 16, 2008.
- (b) If you own or operate an existing molded flexible polyurethane foam affected source, an existing rebond foam production affected sources, or an existing flexible polyurethane foam fabrication affected source, you must achieve compliance with the applicable provisions in this subpart by July 16, 2007.
- (c) If you startup a new affected source on or before July 16, 2007, you must achieve compliance with the applicable provisions in this subpart not later than July 16, 2007.
- (d) If you startup a new affected source after July 16, 2007, you must achieve compliance with the provisions in this subpart upon startup of your affected source.

### Standards and Compliance Requirements

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

- (a) If you own or operate a slabstock flexible polyurethane foam production affected source, you must meet the requirements in paragraph (b) of this section. If you own or operate a molded foam affected source, you must meet the requirements in paragraph (c) of this section. If you own or operate a rebond foam affected source, you must meet the requirements in paragraph (d) of this section. If you own or operate a flexible polyurethane foam fabrication affected source, you must meet the requirements in paragraph (e) of this section.
- (b) If you own or operate a new or existing slabstock polyurethane foam production affected source, you must comply with the requirements in either paragraph (b)(1) or (2) of this section.
- (1) Comply with §63.1293(a) or (b) of subpart III, except that you must use Equation 1 of this section to determine the HAP auxiliary blowing agent (ABA) formulation limit for each foam grade instead of Equation 3 of §63.1297 of subpart III. You must use zero as the formulation limitation for any grade of foam where the result of the formulation equation (using Equation 1 of this section) is negative (i.e., less than zero):

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

Where:

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

IFD = Indentation force deflection, pounds.

DEN = Density, pounds per cubic foot.

- (2) Use no material containing methylene chloride for any purpose in any slabstock flexible foam production process.
- (c) If you own or operate a new or existing molded foam affected source, you must comply with the requirements in paragraphs (c)(1) and (2) of this section.
- (1) You must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) For a molded foam affected source:

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

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

(2) For a rebond foam affected source:

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

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

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

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

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

## Other Requirements and Information

### § 63.11418 What General Provisions apply to this subpart?

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

### § 63.11419 What definitions apply to this subpart?

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

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

### § 63.11420 Who implements and enforces this subpart?

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

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

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

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

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

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

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

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

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

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

§63.9 (i)–(j)	Yes	
§63.10(a)–(b)	Yes	Except that the records specified in §63.10(b)(2) are not required.
§63.10(c)	No	
§63.10(d)(1)	Yes	
§63.10(d)(2)–(3)	No	
§63.10(d)(4)	Yes	
§63.10(d)(5)	No	
§63.10(e)	No	
§63.10(f)	Yes	
§63.11	No	
§63.12	Yes	
§63.13	Yes	
§63.14	Yes	
§63.15	Yes	
§63.16	Yes	

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

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

<b>Source Background and Description</b>
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<b>Source Name:</b>	<b>Creative Foam Medical Systems</b>
<b>Source Location:</b>	<b>405 North Industrial Drive, Bremen, Indiana 46506</b>
<b>County:</b>	<b>Marshall</b>
<b>SIC Code:</b>	<b>3069</b>
<b>Permit Renewal No.:</b>	<b>T099-31487-00033</b>
<b>Permit Reviewer:</b>	<b>Roger Osburn</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Creative Foam Medical Systems (formerly Bremen Corporation) relating to the operation of a stationary vinyl-coated foam product manufacturing source. On February 13, 2012, Bremen Corporation submitted an application to the OAQ requesting to renew its operating permit and change the company name to Creative Foam Medical Systems. Creative Foam Medical Systems (formerly Bremen Corporation) was issued its first Part 70 Operating Permit Renewal T099-18654-00033 on November 13, 2007.

<b>Permitted Emission Units and Pollution Control Equipment</b>
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The source consists of the following permitted emission units:

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.7 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

<b>Insignificant Activities</b>
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- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) natural gas fired air makeup unit, capacity: 5.0 million British thermal units per hour.
  - (2) One (1) natural gas fired air makeup unit, capacity: 1.75 million British thermal units per hour.
  - (3) One (1) natural gas fired air makeup unit, capacity: 7.5 million British thermal units per hour.
  - (4) Four (4) natural gas fired heaters, capacity: 0.2 million British thermal units per hour, each.
  - (5) Two (2) natural gas fired office heaters, capacity: 1.0 million British thermal units per hour, each.
- (b) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and toluene.
- (c) The following foam processing operations, each with a maximum throughput less than one hundred (100) pounds per hour:
  - (1) Four (4) presses.
  - (2) One (1) slicer.
  - (3) One (1) blanker.
  - (4) One (1) buffing booth.
  - (5) One (1) saw cutter.
  - (6) Two (2) saws.
  - (7) One (1) C&C contour saw.
  - (8) One (1) hand contour saw.
  - (9) Two (2) fusion mold ovens.
  - (10) One (1) compression form oven.
  - (11) One (1) compression form press.
  - (12) One (1) fusion mold press.
  - (13) One (1) infrared oven.
- (d) One (1) cutting table, with a maximum throughput less than one hundred (100) pounds of plastic or cardboard per hour.
- (e) Two (2) C & C routers, equipped with a baghouse, each with a maximum throughput less than one hundred (100) pounds of PVC or wood per hour.
- (f) One (1) FDM 3D printer, constructed in 2011, operating a Fortus MC 3D printer, maximum throughput 0.0625 pounds of StrataSys PC-ISO per hour.

- (g) One (1) vinyl radio frequency (RF) Welder, identified as RFW1, constructed in 2011, operating a Callanan 30x48 Welder, capacity: 8 pounds of material per hour.
- (h) One (1) roll-coater, constructed in 2008, operating a Tarp Laminator, capacity: 0.95 feet of 3M Adhesive Transfer Tape per hour.
- (i) One (1) foam die-cutter, constructed in 2011, operating a 150 Ton Schwabe Press, capacity: 40 pounds of foam per hour.

**Existing Approvals**

Since the issuance of the Part 70 Operating Permit T099-18654-00033 on November 13, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Permit Modification No. 099-27926-00033 issued on December 29, 2009.

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.

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Marshall 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.	

- (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. Marshall 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) Marshall 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**  
 Marshall 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.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	573
PM <sub>10</sub>	573
PM <sub>2.5</sub>	573
SO <sub>2</sub>	0.057
VOC	15,966
CO	7.97
NO <sub>x</sub>	9.48
GHGs as CO <sub>2</sub> e	11,448

HAPs	tons/year
Toluene	14,586
MIBK	15,508
Xylenes	4,434
Dimethylformamide	19.7
Ethylbenzene	790
Glycol Ethers	3,872
Isophorone	10.1
Naphthalene	0.745
Cumene	0.004
Formaldehyde	0.007
Hexane	0.171
Benzene, Dichlorobenzene, Lead, Cadmium,	< 0.001, each

HAPs	tons/year
Chromium, Manganese & Nickel	
Total	15,528

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub>, PM<sub>2.5</sub>, and VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions as reported by the source. This information reflects the 2010 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM <sub>10</sub>	0
PM <sub>2.5</sub>	0
SO <sub>2</sub>	0
VOC	7
CO	1
NO <sub>x</sub>	1
HAP (Toluene)	Not Reported

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, 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> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Processes 2 & 4 and Booths 3a and 3b at Process 3	238	238	238	0.0	0.0	<249	0.00	0.0	<24.7	<9.82
Areas 2 and 3	0.0	0.0	0.0	0.0	0.0		0.00	0.0		
Booths 3c and 3d at Process 3	< 11.5	<11.5	<11.5	0.0	0.0		0.00	0.0		
Process 5	0.0	0.0	0.0	0.0	0.0		0.00	0.0		
Combustion	0.180	0.721	0.721	0.057	9.48	0.522	7.97	11,448	0.179	0.171
Storage	0.0	0.0	0.0	0.0	0.0	0.358	0.0	0.0	0.028	0.028
Other insignificant (routers and cutting table)	0.230	0.131	0.131	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total PTE of Entire Source</b>	<b>249.9</b>	<b>249.9</b>	<b>249.9</b>	<b>0.057</b>	<b>9.48</b>	<b>249.9</b>	<b>7.97</b>	<b>11,448</b>	<b>&lt;25</b>	<b>&lt;10</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
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year, and it is not in one of the twenty-eight (28) listed source categories.

**Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
One (1) dip room, identified as Process 2 - VOC	Oxidizer #1	Y	13,850	92.5	100	Y	Y
One (1) final finish area, identified as Process 3 - VOC	Oxidizer #1	Y	1,637	82	100	Y	Y
One (1) final finish area, identified as Process 3 - PM <sub>10</sub>	Dry filters	Y	573	2.86	100	Y	N
One (1) assembly area, identified as Area 2 - VOC	N	Y	358	17.9	100	N	N
One (1) final finish area, identified as Area 3 - VOC	N	Y	21.9	21.9	100	N	N
One (1) Roll Coater, identified as Process 5 - VOC	N	Y	< 25.0	< 25.0	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Processes 2 and 3 for VOC and Process 3 for PM<sub>10</sub>. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements. The CAM Plan includes continuous operating temperature monitoring for the catalytic oxidizer and inspection and maintenance activities for the dry filters.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(c) **Subpart OOOOOO - NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources**

This source is subject to the requirements of this NESHAP because it is a polyurethane foam fabrication source, and it is considered as an area source under NESHAP.

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

**The specific facilities include the following:**

- (1) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (2) One (1) mixing process, identified as Process 4, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 12,671 pounds of coatings mixed per hour.

- (3) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (4) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour
- (5) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of four (4) hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (6) One (1) Roll Coater, identified as Process 5, constructed in 1998, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

#### Insignificant Activities

- (7) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and Toluene.

Creative Foam Medical Systems is considered as an existing affected source under 40 CFR 63, Subpart OOOOOO because it commenced construction before April 4, 2007.

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

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

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

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

<b>State Rule Applicability - Entire Source</b>
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#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Creative Foam Medical Systems will limit the source-wide VOC and PM/PM<sub>10</sub> emissions to less than 250 tons per year by complying with the following conditions:

- (a) VOC  
The total VOC emissions from Process 2, Process 3, Process 4, Process 5, Area 2, and Area 3 shall not exceed 249 tons per twelve (12) consecutive month period.

Compliance with the above limit in conjunction with VOC emissions from other emission units shall limit the source-wide VOC emissions to less than 250 tons per year. Therefore, the source is minor under 326 IAC 2-2, PSD.

- (b) PM/PM<sub>10</sub>  
The PM/PM<sub>10</sub> emissions from booth 3a and 3b, each, shall not exceed 2.62 pounds per hour.

Compliance with the above limits in conjunction with PM/PM<sub>10</sub> PTE of other emission units at the source will ensure that the source-wide non-fugitive PM/PM<sub>10</sub> emissions from the entire source are less than 250 tons per year. Therefore, this is a minor source under 326 IAC 2-2.

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

All facilities were constructed prior to July 27, 1997, with the exception of the one (1) roll coater (Process 5). Pursuant to Minor Permit Modification 099-12291-00033, issued on August 1, 2000, the HAP usage at the one (1) roll coater (Process 5) is limited to less than ten (10) tons per consecutive twelve (12) month period of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 does not apply. This Part 70 Operating Permit Renewal contains limits that make the source an area source of HAPs, as stated in the Federal Rule Applicability Determination section of this document. Those limits will ensure that the requirements of 326 IAC 2-4.1-1 are not applicable to the roll coater, and separate HAP limits for the roll coater (Process 5) are not necessary.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This source is not located in Lake, LaPorte, or Porter County, and will not emit VOCs or PM<sub>10</sub> greater than 250 tons per year. Therefore, in accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2.

<b>State Rule Applicability – Surface Coating Operations</b>
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#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating at Process 3 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### 326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, Significant Permit Modification 099-19959-00033, issued on December 14, 2005, and 326 IAC 8-1-6 (New facilities; General reduction requirements), Processes 2, 3 and 4, and Areas 2 and 3 shall use the following Best Available Control Technology (BACT), as revised by Significant Permit Modification 099-27926-00033.

- (1) A catalytic oxidizer shall be used at all times when Process 2, Process 3 or Process 4 is in operation except as specified in (5) below. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every five (5) years for overall control efficiency using methods approved by the Commissioner.
  - (2) Only dip coating shall be used at Process 2.
  - (3) Airless or high volume, low pressure (HVLP) spray guns or an application with a higher transfer efficiency shall be used at all spray applications. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
  - (4) The maximum VOC content of all coatings used shall not exceed 6.98 pounds per gallon of coating less water.
  - (5) Pursuant to 326 IAC 8-1-2(a)(2), the catalytic oxidizer is not required to be in operation during the months of November, December, January, February, and March.
- (b) The one (1) roll coater, identified as Process 5, shall use less than a total of twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 (New facilities: general reduction requirements) and 326 IAC 2-2, PSD, not applicable to the one (1) roll coater, identified as Process 5.

#### **Testing Requirements**

- (a) Not later than five (5) years of the most recent testing performed on catalytic oxidizer, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every five (5) years for overall control efficiency using methods approved by the Commissioner.
- (b) Not later than five (5) years of the most recent testing performed on catalytic oxidizer, the Permittee shall perform inlet and outlet HAP testing of the catalytic oxidizer, utilizing Method 18 or other methods as approved by the Commissioner, for toluene or the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every five (5) years.

#### **Compliance Determination and Monitoring Requirements**

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

Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (a) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit, or whichever is the greater operating temperature from (i) and (ii) below.
  - (i) The temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC.
  - (ii) The temperature determined in the most recent stack test for HAPs.

The Permittee shall take appropriate response steps whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test.

- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the applicable limits.
- (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps.

The parametric monitoring in (a) and (c) above are not applicable to the catalytic oxidizer when it is not operating during the months of November, December, January, February, and March.

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 13, 2012.

#### Conclusion

The operation of this stationary vinyl-coated foam product manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 099-31487-00033.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Roger Osburn at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0242 or toll free at 1-800-451-6027 extension 3-0242.
- (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: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Company Name: Creative Foam Medical Systems  
Address: 405 North Industrial Drive, Bremen, Indiana  
Part 70 Permit Renewal No.: T099-31487-00033  
Reviewer: Roger Osburn  
Date: July 3, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Maximum Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
<b>Process 2</b>													
Solvent Blend	6.95	100.00%	0.0%	100.0%	0.0%	3162.0	6.95	6.95	3162.00	75888.00	13849.56	0.00	100%
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	3162.0	6.67	6.67	3162.00	75888.00	13849.56	0.00	100%
Toluene	7.3	100.00%	0.0%	100.0%	0.0%	3162.0	7.25	7.25	3162.00	75888.00	13849.56	0.00	100%
F861	9.2	9.50%	0.0%	9.5%	0.0%	3162.0	0.87	0.87	300.39	7209.36	1315.71	0.00	100%
F760	7.0	96.10%	0.0%	96.1%	0.0%	3162.0	6.73	6.73	3038.68	72928.37	13309.43	0.00	100%
DM Topcoat	12.5	0.00%	0.0%	0.0%	0.0%	3162.0	0.00	0.00	0.00	0.00	0.00	0.00	100%
CF1400/ADCT11675/F827	8.7	66.00%	55.0%	11.0%	55.0%	3162.0	2.13	0.96	347.82	8347.68	1523.45	0.00	100%
F856 Urethane Topcoat	7.26	83.80%	0.0%	83.8%	0.0%	3162.0	6.08	6.08	2649.76	63594.14	11605.93	0.00	100%
<b>Process 3</b>													
Solvent Blend	6.95	100.00%	0.0%	100.0%	0.0%	373.7	6.95	6.95	373.70	8968.80	1636.81	0.00	65%
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	373.7	6.67	6.67	373.70	8968.80	1636.81	0.00	65%
Xylene	7.25	100.00%	0.0%	100.0%	0.0%	373.7	7.25	7.25	373.70	8968.80	1636.81	0.00	65%
CF1400/ADCT11675/F827	8.7	66.00%	55.0%	11.0%	0.0%	373.7	0.96	0.96	41.11	986.57	180.05	194.78	65%
F830	7.58	89.00%	37.0%	52.0%	0.0%	373.7	3.94	3.94	194.32	4663.78	851.14	63.02	65%
F861	9.20	9.50%	0.0%	9.5%	0.0%	373.7	0.87	0.87	35.50	852.04	155.50	518.46	65%
F700	8.97	8.00%	0.0%	8.0%	0.0%	373.7	0.72	0.72	29.90	717.50	130.94	527.05	65%
F760	7.00	96.10%	0.0%	96.1%	0.0%	373.7	6.73	6.73	359.13	8619.02	1572.97	22.34	65%
DM Topcoat	12.5	0.00%	0.0%	0.0%	0.0%	373.7	0.00	0.00	0.00	0.00	0.00	572.88	65%
F717	8.97	8.00%	0.0%	8.0%	0.0%	373.7	0.72	0.72	29.90	717.50	130.94	527.05	65%
F856 Urethane Topcoat	7.26	83.80%	0.0%	83.8%	0.0%	373.7	6.08	6.08	313.16	7515.85	1371.64	92.81	65%
<b>Process 4</b>													
Since the coatings mixed at Process 4 are used at Processes 2 and 3, and all VOC used is assumed to be emitted in the calculations above, the emissions from Process 4 are already accounted for above.													
<b>Process 5</b>													
Vynabond	7.06	83.90%	0.0%	83.9%	0.0%	106.6	5.92	5.92	89.44	2146.50	391.74	0.00	100%
<b>Area 2</b>													
MEK	6.72	100.00%	0.0%	100.0%	0.0%	14.9	6.72	6.72	14.90	357.60	65.26	0.00	100%
CF1400/ADCT11675/F827	8.70	66.00%	55.0%	11.0%	0.0%	14.9	0.96	0.96	1.64	39.34	7.18	0.00	100%
Vynabond	7.06	83.90%	0.0%	83.9%	0.0%	14.9	5.92	5.92	12.50	300.03	54.75	0.00	100%
<b>Area 3</b>													
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	5.0	6.67	6.67	5.00	120.00	21.90	0.00	100%
Ink	12.0	0.76%	0.0%	0.8%	0.0%	5.0	0.09	0.09	0.04	0.91	0.17	0.00	100%

PM Control Efficiency for Process 3: 99.50%  
VOC Control Efficiency for Processes 2, 3 & 4: 95.00%

<b>Unrestricted from Processes 2, 3 &amp; 4:</b>	<b>3536</b>	<b>84857</b>	<b>15486</b>	<b>573</b>
<b>Controlled from Processes 2, 3 &amp; 4:</b>	<b>177</b>	<b>4243</b>	<b>774</b>	<b>2.86</b>
<b>Unrestricted from Process 5 and Areas 2 &amp; 3:</b>	<b>109</b>	<b>2624</b>	<b>479</b>	<b>0.00</b>
<b>Unrestricted Total:</b>	<b>3645</b>	<b>87481</b>	<b>15965</b>	<b>573</b>
<b>Controlled Total:</b>	<b>286</b>	<b>6867</b>	<b>1253</b>	<b>2.86</b>

The Permittee is required to limit usage and use the control devices in order to comply with the VOC limitations in the permit.

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
Coating HAP Emission Calculations**

Company Name: Creative Foam Medical Systems  
Address: 405 North Industrial Drive, Bremen, Indiana  
Part 70 Permit Renewal No.: T099-31487-00033  
Reviewer: Roger Osburn  
Date: July 3, 2012

Material	Density (Lb/Gal)	Material Usage (lbs/hr)	Weight % Toluene	Weight % MIBK	Weight % Xylene	Weight % Dimethyl-formamide	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % Isophorone	Weight % Naphthalene	Weight % Cumene	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Total Emissions (ton/yr)	
<b>Process 2</b>																						
Solvent Blend	6.95	3162.000	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6232.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6232.30	
MIBK	6.67	3162.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	13849.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13849.56	
Toluene	7.3	3162.000	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13849.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13849.56	
F861	9.2	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F760	7.0	3162.000	22.20%	32.90%	20.20%	0.00%	5.10%	0.00%	0.00%	0.00%	0.00%	3074.60	4556.51	2797.61	0.00	706.33	0.00	0.00	0.00	0.00	11135.05	
DM Topcoat	12.5	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
CF1400/ADCT11675/F827	8.7	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F856 Urethane Topcoat	7.26	3162.000	30.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	4154.87	0.00	0.00	0.00	0.00	3462.39	0.00	0.00	0.00	7617.26	
<b>Process 3</b>																						
Solvent Blend	6.95	373.700	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	736.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	736.56	
MIBK	6.67	373.700	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1636.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1636.81	
Xylene	7.25	373.700	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1636.81	0.00	0.00	0.00	0.00	0.00	0.00	1636.81	
CF1400/ADCT11675/F827	8.7	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F830	7.58	373.700	26.00%	0.00%	10.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	425.57	0.00	163.68	0.00	49.10	0.00	0.00	0.00	0.00	638.35	
F861	9.20	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F700	8.97	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F760	7.00	373.700	22.20%	32.90%	20.20%	0.00%	5.10%	0.00%	0.00%	0.00%	0.00%	363.37	538.51	330.63	0.00	83.48	0.00	0.00	0.00	0.00	1315.99	
DM Topcoat	12.5	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F717	8.97	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
F856 Urethane Topcoat	7.26	373.700	30.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	491.04	0.00	0.00	0.00	0.00	0.00	409.20	0.00	0.00	900.24	
<b>Process 4</b>																						
Since the coatings mixed at Process 4 are used at Processes 2 and 3, and all HAP used is assumed to be emitted in the calculations above, the emissions from Process 4 are already accounted for above.																						
<b>Process 5</b>																						
Vynabond	7.06	106.600	0.00%	0.00%	0.00%	3.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	17.28	0.00	0.00	0.00	0.00	0.00	17.28	
<b>Area 2</b>																						
MEK	6.72	14.900	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
CF1400/ADCT11675/F827	8.70	14.900	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Vynabond	7.06	14.900	0.00%	0.00%	0.00%	3.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	2.41	0.00	0.00	0.00	0.00	0.00	2.41	
<b>Area 3</b>																						
MIBK	6.67	5.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	21.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.90	
Ink	12.0	5.000	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	46.00%	3.40%	0.02%	0.00	0.00	0.00	0.00	0.00	0.00	10.07	0.74	0.00	10.83	
												<b>Unrestricted from Processes 2, 3 &amp; 4:</b>	14586	15486	4434	0.00	790	3872	0.00	0.00	0.00	15486
												<b>Control efficiency for Processes 2, 3 &amp; 4:</b>	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%
												<b>Controlled from Processes 2, 3 &amp; 4:</b>	1459	1549	443	0.00	79.0	387.16	0.00	0.00	0.00	1549
												<b>Unrestricted from Process 5 and Areas 2 &amp; 3:</b>	0.00	21.90	0.00	19.7	0.00	0.00	10.1	0.745	0.00	41.6
												<b>Unrestricted Total:</b>	14586	15508	4434	19.7	790	3872	10.1	0.745	0.00	15528
												<b>Controlled Total:</b>	1459	1571	443	19.7	79.0	387	10.1	0.745	0.00	1590

**METHODOLOGY**

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

The Permittee is required to limit usage and use the control device in order to comply with the HAP limitations in the permit.

**Appendix A: Emission Calculations  
Insignificant Particulate Emissions**

Company Name: Creative Foam Medical Systems  
 Address: 405 North Industrial Drive, Bremen, Indiana  
 Part 70 Permit Renewal No.: T099-31487-00033  
 Reviewer: Roger Osburn  
 Date: July 3, 2012

Process	Maximum Throughput lbs/hr	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)
Two (2) routers (wood or PVC)	200	0.35	0.20	0.035	0.020	0.153	0.088
One (1) cutting table (plastic or cardboard)	100	0.35	0.20	0.018	0.010	0.077	0.044
						<b>0.230</b>	<b>0.131</b>

**Methodology**

Emission factors from FIRES 6.23, SCC 3-07-008-02 for sawing, which would be conservative for the routers and cutting table.

PM/PM10 Emissions (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton)

PM/PM10 Emissions (tons/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 lb/2,000 tons

**Natural Gas Fired Catalytic Oxidizer, Air Make-up Units and Heaters**

Company Name: Creative Foam Medical Systems

Address: 405 North Industrial Drive, Bremen, Indiana

Part 70 Permit Renewal No.: T099-31487-00033

Reviewer: Roger Osburn

Date: July 3, 2012

Emission Unit ID	Total Heat Input Capacity (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Catalytic Oxidizer	4.60	40.30
Three (3) Air Makeup Units	14.25	124.8
Two (2) Office Heaters	2.00	17.52
Four (4) Heaters	0.80	7.01
<b>TOTAL</b>	<b>21.65</b>	<b>189.65</b>

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.2	0.7	0.7	0.1	9.5	0.5	8.0

\*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

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.991E-04	1.138E-04	7.112E-03	1.707E-01	3.224E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.741E-05	1.043E-04	1.328E-04	3.603E-05	1.991E-04

Methodology is the same as criteria pollutant calculations above

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

<b>Total HAPs</b>
<b>0.179</b>

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	11,379	0.2	0.2
Summed Potential Emissions in tons/yr	11,380		
CO2e Total in tons/yr	<b>11,448</b>		

**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) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations  
Summary**

Company Name: Creative Foam Medical Systems  
Address: 405 North Industrial Drive, Bremen, Indiana  
Part 70 Permit Renewal No.: T099-31487-00033  
Reviewer: Roger Osburn  
Date: July 3, 2012

**Unrestricted Potential Emissions**

Process	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	CO2e (tons/yr)
<b>Processes 2, 3 &amp; 4</b>	573	573	573	0.000	0.00	15486	0.00	--
<b>Process 5 &amp; Areas 2 &amp; 3</b>	0.000	0.000	0.000	0.000	0.00	479	0.00	--
<b>Combustion</b>	0.180	0.721	0.721	0.057	9.48	0.522	7.97	11448.49
<b>Storage</b>	0.000	0.000	0.000	0.000	0.00	0.056	0.00	--
<b>Routers and Cutting Table</b>	0.230	0.131	0.000	0.000	0.00	0.000	0.00	--
<b>Total</b>	<b>573</b>	<b>574</b>	<b>574</b>	<b>0.057</b>	<b>9.48</b>	<b>15966</b>	<b>7.97</b>	--

Process	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)	
<b>Processes 2, 3 &amp; 4</b>	14586	15486	4434	0.00	790	3872	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15486.37
<b>Process 5 &amp; Areas 2 &amp; 3</b>	0.00	21.9	0.00	19.7	0.00	0.00	10.1	0.745	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	41.59
<b>Combustion</b>	0.00	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.00	0.18
<b>Storage</b>	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
<b>Routers and Cutting Table</b>	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00
<b>Total</b>	<b>14586</b>	<b>15508</b>	<b>4434</b>	<b>19.7</b>	<b>790</b>	<b>3872</b>	<b>10.1</b>	<b>0.745</b>	<b>0.004</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.007</b>	<b>0.171</b>	<b>4.74E-05</b>	<b>1.04E-04</b>	<b>1.33E-04</b>	<b>3.60E-05</b>	<b>1.99E-04</b>	<b>0.00</b>	<b>15528.16</b>

**Controlled Potential Emissions**

Process	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	CO2e (tons/yr)
<b>Processes 2, 3 &amp; 4</b>	2.86	2.86	2.86	0.00	0.00	774	0.00	--
<b>Process 5 &amp; Areas 2 &amp; 3</b>	0.00	0.00	0.00	0.00	0.00	479	0.00	--
<b>Combustion</b>	0.180	0.721	0.721	0.057	9.48	0.522	7.97	11448.49
<b>Storage</b>	0.00	0.00	0.00	0.00	0.00	0.056	0.00	--
<b>Routers and Cutting Table</b>	0.230	0.131	0.131	0.000	0.00	0.000	0.00	--
<b>Total</b>	<b>3.04</b>	<b>3.59</b>	<b>3.59</b>	<b>0.057</b>	<b>9.48</b>	<b>1254</b>	<b>7.97</b>	--

Process	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)	
<b>Processes 2, 3 &amp; 4</b>	1459	1549	443	0.00	79.0	387	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Process 5 &amp; Areas 2 &amp; 3</b>	0.00	21.9	0.00	19.7	0.00	0.00	10.1	0.745	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	41.59
<b>Combustion</b>	0.00	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.00	0.18
<b>Storage</b>	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
<b>Routers and Cutting Table</b>	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00
<b>Total</b>	<b>1459</b>	<b>1571</b>	<b>443</b>	<b>19.7</b>	<b>79.0</b>	<b>387</b>	<b>10.1</b>	<b>0.745</b>	<b>0.004</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.007</b>	<b>0.171</b>	<b>4.74E-05</b>	<b>1.04E-04</b>	<b>1.33E-04</b>	<b>3.60E-05</b>	<b>1.99E-04</b>	<b>0.00</b>	<b>41.80</b>

**Limited Potential to Emit**

Process	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	CO2e (tons/yr)
<b>Processes 2 &amp; 4 and Booths 3a and 3b at Process 3 #</b>	<249	<249	<249	0.00	0.00	<249	0.00	--
<b>Areas 2 and 3</b>				0.00	0.00		0.00	--
<b>Booths 3c and 3d at Process 3 #</b>				0.00	0.00		0.00	--
<b>Process 5 #</b>				0.00	0.00		0.00	--
<b>Combustion</b>	0.721	0.721	0.721	0.057	9.48	0.522	7.97	11448.49
<b>Storage</b>	0.00	0.00	0.00	0.00	0.00	0.357	0.00	--
<b>Routers and Cutting Table</b>	0.131	0.131	0.131	0.000	0.00	0.000	0.00	--
<b>Total</b>	<b>&lt;250</b>	<b>&lt;250</b>	<b>&lt;250</b>	<b>0.057</b>	<b>9.48</b>	<b>&lt;250</b>	<b>7.97</b>	--

Process	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)	
<b>Processes 2, 3 &amp; 4*</b>	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	0.00	0.00	0.00	0.00	0.00	24.70	
<b>Process 5 &amp; Areas 2 &amp; 3*</b>														0.00	0.00	0.00	0.00	0.00		
<b>Combustion</b>	0.00	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	Negl.	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.00	0.18
<b>Storage</b>	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
<b>Routers and Cutting Table</b>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>9.85</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.83</b>	<b>9.99</b>	<b>4.74E-05</b>	<b>1.04E-04</b>	<b>1.33E-04</b>	<b>3.60E-05</b>	<b>1.99E-04</b>	<b>0.00</b>	<b>24.91</b>

\*Emissions are limited to less than 9.82 tons of each individual HAP. Therefore, the total for Hexane is less than 10 tons per year.

# Pursuant to SPM 099-19959-00033, Booths 3c and 3d are limited to 3.42 lbs/hr; pursuant to SSM 099-10314-00033, Booths 3a and 3b are limited to 54.3 lbs/hr.



# 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)

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

**TO:** Doug Hofferth  
Creative Foam Medical Systems  
405 N Industrial Dr  
Bremen, IN 46506

**DATE:** December 21, 2012

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

**SUBJECT:** Final Decision  
Title V - Renewal  
099-31487-00033

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:  
Kent Lutian (Vice President & General Manager)  
Alexander Leshner (August Mack Environmental, Inc)  
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)

December 21, 2012

TO: Bremen Public Library

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

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

**Applicant Name: Creative Foam Medical Systems**  
**Permit Number: 099-31487-00033**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 12/21/2012 Creative Foam Medical Systems 099-31487-00033 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Doug Hofferth Creative Foam Medical Systems 405 N Industrial Dr Bremen IN 46506 (Source CAATS) via confirm delivery										
2		Kent Lutian VP/ GM Creative Foam Medical Systems 405 N Industrial Dr Bremen IN 46506 (RO CAATS)										
3		Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library)										
4		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)										
5		Bremen Town Council and Town Manager 111 South Center Street Bremen IN 46506 (Local Official)										
6		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)										
7		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)										
8		Alexander Leshner August Mack Environmental, Inc. 1302 N Meridian St Indianapolis IN 46202 (Consultant)										
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