



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: May 23, 2013

RE: 3M Indianapolis/ 097-32459-00368

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit OFFICE OF AIR QUALITY

**3M Indianapolis (79th Street)
5457 West 79th Street
Indianapolis, Indiana 46268**

(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.

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

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

Operation Permit No.: M097-32459-00368	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 23, 2013 Expiration Date: May 23, 2018

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic (polyurethane, urethane, and vinyl) foam product manufacturing operation.

Source Address:	5457 West 79th Street, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 692-3578
SIC Code:	3842 (Orthopedic, Prosthetic, and Surgical Appliances and Supplies)
County Location:	Marion
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) polyurethane molding line, installed in 1990 and modified in 2005, identified as Emission Unit 901, with a maximum dry raw materials and VOC/HAP containing raw materials usage rate of 89 pounds per hour, no control, and exhausting to Stacks SU-11, SU-12, and SU-14.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

- (b) One (1) polyurethane molding line, installed in 1996 and modified in 2006, identified as Emission Unit 908, producing foam for either of two product lines, with a maximum VOC/HAP containing raw material usage rate of 1.95 pounds per hour, and no control. The emissions are exhausted through stack SU-8.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

Note: This emission unit is presently located at Aearo Technologies LLC (Plant ID 097-00319), but is operated and maintained by 3M Indianapolis 79th Street plant (Plant ID 097-00368). All material that is produced by this line is shipped to the 3M Indianapolis 79th Street plant. This equipment will eventually be removed and relocated to the 3M Indianapolis 79th Street plant. The emissions from this line will be included in the source-wide potential to emit for 3M Indianapolis (79th Street).

- (c) One (1) polyurethane molding line, constructed in 2007, identified as Emission Unit 909, with a maximum VOC containing raw material usage rate of 113.12 pounds per hour, no control and exhausting to Stacks SU-9, SU-10, and SU-19.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

- (d) One (1) active hearing area, constructed in 2010, maximum line capacity of 1,200 units per day, consisting of the following: handheld soldering operations and hand application of VOC/HAP containing materials, including adhesives and coatings, small electric ovens using electric heat or ultraviolet (UV) light.

- (e) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (1) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-1.

- (2) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-2.

- (3) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-3.

- (4) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.175 MMBtu per hour, and exhausting to stack SU-4.

- (5) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-5.

- (6) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.175 MMBtu per hour, and exhausting to stack SU-6.

- (7) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-7.

- (8) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-16.

- (9) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.20 MMBtu per hour, and exhausting to stack SU-17.

- (10) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.10 MMBtu per hour, and exhausting to stack SU-18.

- (11) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.20 MMBtu per hour, and exhausting to stack SU-15.

- (f) Paved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- (a) This permit, M097-32459-00368, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (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 Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M097-32459-00368 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- Request for renewal shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

- (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.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) polyurethane molding line, installed in 1990 and modified in 2005, identified as Emission Unit 901, with a maximum dry raw materials and VOC/HAP containing raw materials usage rate of 89 pounds per hour, no control, and exhausting to Stacks SU-11, SU-12, and SU-14.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

- (b) One (1) polyurethane molding line, installed in 1996 and modified in 2006, identified as Emission Unit 908, producing foam for either of two product lines, with a maximum VOC/HAP containing raw material usage rate of 1.95 pounds per hour, and no control. The emissions are exhausted through stack SU-8.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

Note: This emission unit is presently located at Aearo Technologies LLC (Plant ID 097-00319), but is operated and maintained by 3M Indianapolis 79th Street plant (Plant ID 097-00368). All material that is produced by this line is shipped to the 3M Indianapolis 79th Street plant. This equipment will eventually be removed and relocated to the 3M Indianapolis 79th Street plant. The emissions from this line will be included in the source-wide potential to emit for 3M Indianapolis (79th Street).

- (c) One (1) polyurethane molding line, constructed in 2007, identified as Emission Unit 909, with a maximum VOC containing raw material usage rate of 113.12 pounds per hour, and exhausting to Stacks SU-9, SU-10, and SU-19.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

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

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

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) polyurethane molding line, installed in 1990 and modified in 2005, identified as Emission Unit 901, with a maximum dry raw materials and VOC/HAP containing raw materials usage rate of 89 pounds per hour, no control, and exhausting to Stacks SU-11, SU-12, and SU-14.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

- (b) One (1) polyurethane molding line, installed in 1996 and modified in 2006, identified as Emission Unit 908, producing foam for either of two product lines, with a maximum VOC/HAP containing raw material usage rate of 1.95 pounds per hour, and no control. The emissions are exhausted through stack SU-8.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

Note: This emission unit is presently located at Aearo Technologies LLC (Plant ID 097-00319), but is operated and maintained by 3M Indianapolis 79th Street plant (Plant ID 097-00368). All material that is produced by this line is shipped to the 3M Indianapolis 79th Street plant. This equipment will eventually be removed and relocated to the 3M Indianapolis 79th Street plant. The emissions from this line will be included in the source-wide potential to emit for 3M Indianapolis (79th Street).

- (c) One (1) polyurethane molding line, constructed in 2007, identified as Emission Unit 909, with a maximum VOC containing raw material usage rate of 113.12 pounds per hour, and exhausting to Stacks SU-9, SU-10, and SU-19.

This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR Part 63, Subpart OOOOOO.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam
Production and Fabrication Area Sources [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) for the polyurethane molding lines (901, 908, and 909):

- (a) 40 CFR Part 63.11414(a)(1), (b)(2), and (c)
- (b) 40 CFR Part 63.11415(b)
- (c) 40 CFR Part 63.11416(a), (c), and (f)
- (d) 40 CFR Part 63.11417(a), (c)(1), and (d)
- (e) 40 CFR Part 63.11418
- (f) 40 CFR Part 63.11419
- (g) 40 CFR Part 63.11420
- (h) Table 1

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	3M Indianapolis (79th Street)
Address:	5457 West 79th Street
City:	Indianapolis, Indiana 46268
Phone #:	(317) 692-3578
MSOP #:	M097-32459-00368

I hereby certify that 3M Indianapolis (79th Street) is:

still in operation.

no longer in operation.

I hereby certify that 3M Indianapolis (79th Street) is:

in compliance with the requirements of MSOP M097-32459-00368.

not in compliance with the requirements of MSOP M097-32459-00368.

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

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

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Attachment A

Title 40: Protection of Environment

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:

ABA_{limit} = 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 splitter 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 MMMMM; § 63.2 of subpart A; and in this section as follows:

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

§ 63.11420 Who implements and enforces this subpart?

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

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

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

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

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

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

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

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

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

Subpart A reference	Applies to Subpart OOOOOO?	Comment
§ 63.1	Yes	
§ 63.2	Yes	Definitions are modified and supplemented by § 63.11419.
§ 63.3	Yes	
§ 63.4	Yes	
§ 63.5	Yes	
§ 63.6(a)-(d)	Yes	
§ 63.6(e)(1)-(2)	Yes	

Subpart A reference	Applies to Subpart OOOOOO?	Comment
§ 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
Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	3M Indianapolis (79th Street)
Source Location:	5457 West 79th Street, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	3842 (Orthopedic, Prosthetic, and Surgical Appliances and Supplies)
Operation Permit No.:	097-32459-00368
Permit Reviewer:	Brian Williams

On October 29th, 2012, the Office of Air Quality (OAQ) received an application from 3M Indianapolis (79th Street) related to the transition of a Part 70 Operating Permit to a MSOP due to the re-evaluation of the source determination that was initially made in 2003.

Source Definition

3M Company has three (3) plants in an industrial park in Indianapolis, Indiana. 3M has requested that IDEM, OAQ review a determination from 2003 that all three plants are part of the same major source. The plants are the following:

- (1) 3M 79th Street plant (Plant ID 097-00368),
- (2) 3M Woodland Drive plant (Plant ID 097-00368) and
- (3) Aearo Technologies LLC plant (Plant ID 097-00319).

IDEM, OAQ has examined whether these three plants should remain part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two or more plants to be considered one major source, they must meet all three of the following criteria:

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

IDEM's Nonrule Policy Document Air-005 states that if two or more plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of two or more plants, then common ownership exists.

The 3M 79th Street plant and the 3M Woodland plant are owned and operated directly by 3M Company. Aearo Technologies LLC is a wholly owned subsidiary of 3M Company. There are no common corporate officers between 3M Company and Aearo Technologies LLC. 3M Company does own 100% of each of the three plants, therefore common ownership exists. Air-005 also states that if the activities are owned by the same person or entity, common control exists. Therefore the first part of the major source definition is met for all three plants.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

The 3M 79th Street plant produces personal safety equipment and has the two-digit SIC Code 38 for the Major Group Measuring, Analyzing and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks. This group includes the four-digit SIC Code 3842, which includes personal safety appliances and equipment.

The Aearo Technologies plant has the two-digit SIC Code of 30 for the Major Group Rubber and Miscellaneous Plastic Products. This code includes the four-digit SIC Code 3086 for Plastic Foam Products which includes Aearo's principal products of foamed plastic products.

IDEM notes that in 2003, the City of Indianapolis, acting as an air permit contractor for IDEM, assigned the 79th Street plant and the Aearo plant the same SIC Code in Title V Operating Permit T097-8852-00368. The basis for this determination was not set out in the Technical Support Document. IDEM ratified this determination when it issued Title V Operating Permit T097-8852-00368 on February 19, 2003. These two plants have consistently claimed different two digit SIC Codes and have not changed the type of principal products they produce since 2003.

The 3M Woodland Drive plant is a warehouse. The 79th Street plant and the Aearo Technologies plant both send products to the Woodland plant for shipping to customers. The 3M Woodland plant has the two-digit code 42 for the Major Group Motor Freight Transportation and Warehousing. Therefore, all three plants have different two-digit SIC Codes.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The 3M 79th Street plant sends almost 100% of its annual output to the 3M Woodland warehouse. The Aearo Technologies plant sends about 40% of its production to the 3M Woodland warehouse and ships the remainder directly to customers. Therefore, the 3M Woodland warehouse and the 3M 79th Street plant have a support relationship.

One production line at the Aearo Technologies plant, the 908 line, is operated by personnel who are employed by and supervised by the 79th Street plant. The 79th Street plant has 165 full time employees, 49 of which work at the 908 line at the Aero Technologies plant. The Aero Technologies plant has 134 of its own employees. The 908 line makes ear plugs. None of the raw material for the ear plugs comes from the Aero Technologies plant or the 79th Street plant. The 908 line products are transferred to the 79th Street plant. The 908 line produces about 3.5% of the total production at the Aero Technologies plant. Since the 908 line production is less than 50% of the Aero Technologies plant's total output, there is no support relationship.

Since all the plants have different two-digit SIC Codes, the second part of the major source definition is met only for the two plants that have a support relationship, the 79th Street plant and the Woodland warehouse.

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are located on separate properties.

The 3M 79th Street plant is directly across the street from the Aearo Technologies plant. These two plants share a common border and are therefore located on contiguous properties, meeting the third part of the major source definition.

The 3M Woodland plant is located about one half mile from the other two plants in the same industrial park. IDEM notes that in the 2003 permit, Title V Operating Permit T097-8852-00368, the Technical Support Document stated that all three plants were on contiguous properties. This seems to be an unintentional error since the warehouse has not changed its location, having always been one half mile from the other two plants. Since the 3M Woodland warehouse is not on a contiguous property, IDEM examined whether the 3M Woodland warehouse is on an adjacent

property.

The dictionary definition of “adjacent” as “close to; lying near” is very general. In determining if two or more sources are adjacent, IDEM follows its nonrule policy document NPD Air-005 and focuses on the distance between the sources and the interaction between them. This is done on an individual basis looking at the specific circumstances of the sources involved.

Two U.S. EPA advisory letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term “adjacent”. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are “adjacent” going as far back as the preamble to the 1980 NSR program definition of “major source”.

The evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”. The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. In addition to determining the distance between the sources, IDEM asks these questions:

- (1) Are materials routinely transferred between the plants?
- (2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
- (3) Is the production process itself split in any way between the plants?

Finished products are routinely sent from the 3M 79th Street plant and the Aearo Technologies plant to the 3M Woodland plant. The 3M Woodland plant has separate managers and separate staff from the staff at the other two plants. The production process itself is not split between the plants since production has finished before the products are sent to the 3M Woodland plant for warehousing and shipping. The warehousing and shipping of the finished products is not affected by the relatively short distance between the plants. The warehouse could be much further away without any affect except increased fuel costs. The 3M Woodland plant is not close enough to the other two plants to enable them to operate as one source. The 3M Woodland plant is therefore not adjacent to either of the other two plants and does not meet the third part of the major source definition.

Since none of the three plants meets all three parts of the definition with any of the other two plants, IDEM, OAQ has determined that none of the plants are part of the same major source.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 Operating Permit Renewal No. 097-24813-00368, issued on October 26, 2009;
- (b) Administrative Amendment No. 097-28858-00368, issued on April 6, 2010; and
- (c) Significant Permit Modification No. 097-29794-00368, issued on June 1, 2011.

Due to this application, the source is transitioning from a Part 70 Operating Permit to a MSOP.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion 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

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by 3M Indianapolis (79th Street) on October 29, 2012, relating to the transition of a plastic (polyurethane, urethane, and vinyl) foam product manufacturing operation from a Part 70 Operating Permit to a MSOP. The source has requested that the names of the material used at this source and process flow diagrams be treated as confidential. IDEM has reviewed the confidentiality request and agrees that the material and process flow diagram can be treated as confidential because this information is not necessary to determine the permit level.

The source consists of the following permitted emission units:

- (a) One (1) polyurethane molding line, installed in 1990 and modified in 2005, identified as Emission Unit 901, with a maximum dry raw materials and VOC/HAP containing raw materials usage rate of 89 pounds per hour, no control, and exhausting to Stacks SU-11, SU-12, and SU-14. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.
- (b) One (1) polyurethane molding line, installed in 1996 and modified in 2006, identified as Emission Unit 908, producing foam for either of two product lines, with a maximum VOC/HAP containing raw material usage rate of 1.95 pounds per hour, and no control. The emissions are exhausted through stack SU-8. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

Note: This emission unit is presently located at Aearo Technologies LLC (Plant ID 097-00319), but is operated and maintained by 3M Indianapolis 79th Street plant (Plant ID 097-00368). All material that is produced by this line is shipped to the 3M Indianapolis 79th Street plant. This equipment will eventually be removed and relocated to the 3M Indianapolis 79th Street plant. The emissions from this line will be included in the source-wide potential to emit for 3M Indianapolis (79th Street).

- (c) One (1) polyurethane molding line, constructed in 2007, identified as Emission Unit 909, with a maximum VOC containing raw material usage rate of 113.12 pounds per hour, and exhausting to Stacks SU-9, SU-10, and SU-19. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.
- (d) One (1) active hearing area, constructed in 2010, maximum line capacity of 1,200 units per day, consisting of the following: handheld soldering operations and hand application of VOC/HAP containing materials, including adhesives and coatings, small electric ovens using electric heat or ultraviolet (UV) light.
- (e) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-1.
 - (2) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-2.
 - (3) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-3.
 - (4) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.175 MMBtu per hour, and exhausting to stack SU-4.
 - (5) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-5.
 - (6) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.175 MMBtu per hour, and exhausting to stack SU-6.

- (7) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-7.
 - (8) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.25 MMBtu per hour, and exhausting to stack SU-16.
 - (9) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.20 MMBtu per hour, and exhausting to stack SU-17.
 - (10) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.10 MMBtu per hour, and exhausting to stack SU-18.
 - (11) One (1) natural gas-fired space heater, with a maximum heat input capacity of 0.20 MMBtu per hour, and exhausting to stack SU-15.
- (f) Paved roads and parking lots with public access.

The source has removed the following permitted emission units:

- (a) One polyurethane molding line, installed in 1991, identified as Emission Unit 902 with a production capacity of 2,000 pairs of earplugs per hour, and exhausting to Stack SU-13. The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III. This unit is an affected unit under 40 CFR 63, Subpart OOOOOO.
- (b) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified as follows, volatile organic compounds (VOC) less than three (3) pounds per hour or fifteen (15) pounds per day, whichever is lower, including: two (2) cord tipper processes installed in 1993, with a maximum tipper solutions usage rate of 3,415 lbs/yr. Emissions from this emission unit exhaust through stack SU-11.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	10.51
PM10 ⁽¹⁾	2.18
PM2.5	0.59
SO ₂	0.01
NO _x	1.03
VOC	46.29
CO	0.86
GHGs as CO ₂ e	1,243

(1) 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".

HAPs	Potential To Emit (tons/year)
Methylene diphenyl diisocyanate (MDI)	1.25
Formaldehyde	0.92
2,4-Toluene diisocyanate (TDI)	0.44
Xylene	0.04
Hexane	0.019
All Other HAPs	0.061
TOTAL HAPs	2.73

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production, 40 CFR Part 63, Subpart III (326 IAC 20-22), are not included in the permit, since this plastic (polyurethane, urethane, and vinyl) foam product manufacturing operation is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Fabrication Operations, 40 CFR Part 63, Subpart MMMMM (326 IAC 20-66), are not included in the permit, since this source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production Area Sources, 40 CFR Part 63, Subpart DDDDDD, are not included in this permit because this source does not meet the definition of a PVC plant.
- (f) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR Part 63, Subpart OOOOOO are included in this permit for the flexible polyurethane foam operations. This facility is an area source of hazardous air pollutants and operates a a molded flexible polyurethane foam operation. This facility does not produce slabstock flexible polyurethane foam or rebonded foam or participate in flexible polyurethane foam fabrication.

The facilities subject to this rule include the following:

- (1) One polyurethane molding line, installed in 1990 and modified in 2005, identified as Emission Unit 901, with a maximum VOC/HAP containing raw materials usage rate of 89 pounds per hour, and exhausting to Stack SU-12. The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.
- (2) One polyurethane molding line, approved for construction in 2007, identified as Emission Unit 909, with a maximum VOC containing raw material usage rate of 113.12 pounds per hour, and exhausting to Stacks SU-9 and SU-10. The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.
- (3) One polyurethane molding line, installed in 1996 and modified in 2006, identified as Emission Unit 908, producing foam for either of two product lines, with a maximum VOC/HAP containing raw material usage rate of 1.95 pounds per hour. The emissions are exhausted through stack SU-8. This unit is an affected unit under 40 CFR Part 63, Subpart OOOOOO.

Applicable portions of the NESHAP are the following:

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

This is an existing requirement in Part 70 Operating Permit No. 097-24813-00368, issued on October 26, 2009.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR Part 63, Subpart OOOOOO.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the paved roads do not have potential fugitive particulate emissions greater than 25 tons per year.
- (i) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is located in Marion County, is not specifically listed in 326 IAC 6.5-6 and has a potential to emit less than 100 tons of PM per year and actual emissions from production related processes are less than 10 tons of PM per year. Therefore, this source is not subject to the requirements of 326 IAC 6.5.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Polyurethane Molding Lines

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plans)
Pursuant to 326 IAC 1-6-3, the source shall prepare and maintain a preventive maintenance plan for the three (3) polyurethane molding lines (901, 908, and 909).
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2.
 - (1) The polyurethane molding line (901) has a potential to emit 0.0005 tons of PM per year. Therefore, the polyurethane molding line (901) is not subject to the requirements of 326 IAC 6-3-2.
 - (2) The polyurethane molding lines (908 and 909) do not have the potential to emit PM, so each line is not subject to the requirements of 326 IAC 6-3-2.

- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each polyurethane molding line (901, 908, and 909) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each line is less than twenty-five (25) tons per year.

Active Hearing Area

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The active hearing area hand applies adhesives using a brush. Therefore, pursuant to 326 IAC 6-3-1(b)(8), the active hearing area is exempt from the requirements of 326 IAC 6-3-2.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The active hearing area is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from this process is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-2-1(a), the active hearing area is not subject to 326 IAC 8-2 because the operations performed in this area do not belong to one of the categories in 326 IAC 8-2-2 through 326 IAC 8-2-13.

Natural Gas Combustion Units

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (d) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The natural gas-fired combustion units are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty-five (25) tons per year.
- (e) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.
- (f) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Compliance Determination, Monitoring and Testing Requirements

- (a) There are no compliance determination and monitoring requirements applicable to this source.
- (b) The majority of the 2,4-Toluene diisocyanate (TDI) used in foam production is consumed during the polymerization reactions; however, TDI has been detected in emissions from foam production. The emission factor is taken from a study performed in Germany in 1980, commonly known in the foam industry as the Stuttgart study, which measured TDI emissions at 0.1 pounds per ton of TDI used (EPA Manual for Best Management Practices for Pollution Prevention in the Slabstock and Molded Flexible Polyurethane Foam Industry (EPA/625/R-96/005)). A conservative estimate was made multiplying this by a factor of 10. IDEM has evaluated the 2,4-Toluene diisocyanate (TDI) emission factor for the polyurethane molding line (901 and 909) and determined it is not necessary for the source to perform stack testing to verify the emission factor. Therefore, there are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 29th, 2012. Additional information was received on February 18th, 2013, March 6th, 2013, March 8th, 2013, and March 25th, 2013.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 097-32459-00368. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (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.in.gov/idem

**Appendix A: Emissions Calculations
PM Emissions
901 Polyurethane Molding Line**

Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032) \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k (PM2.5) =	0.053	= particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
U =	5	= worst case annual mean wind speed (Source: NOAA, 2006*)
M =	2.0	= material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
E_f (PM) =	2.37E-03	lb PM/ton of material handled
E_f (PM10) =	1.12E-03	lb PM10/ton of material handled
E_f (PM2.5) =	1.70E-04	lb PM2.5/ton of material handled

Maximum Material Handling Throughput =	89	pounds per hour
Maximum Material Handling Throughput =	390	tons per year

Process ID	Description	Material	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PTE of PM2.5 (tons/yr)
901	Polyurethane Molding Line	Component C	4.62E-04	2.18E-04	3.31E-05

Note:

Polyurethane Molding Lines 908 and 909 do not use dry materials. Therefore, no PM emissions are anticipated from these lines.

Methodology

Mean wind speed, assumed to be 5 mph as a conservative assumption though all materials handling occurs inside
 Materials moisture content %, assumed to be 2% as the mid-range of source conditions for the materials handling equation
 Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

**Appendix A: Emissions Calculations
VOC and HAP Emissions
Polyurethane Molding Lines**

**Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams**

Process ID	Description	Material*	Maximum Rate (lb/hr)	% of Composition	VOC Content %	Total HAP Content %	Total HAP Emission Factor (lb/ton)	Potential to Emit VOC (ton/yr)	Potential to Emit Total HAPs (ton/yr)
901	Polyurethane Molding Line	Component A**	89.00	61.50%	3.0%	NA	1.00	7.19	0.19
		Component B	89.00	31.16%	0.08%	0.06%	NA	0.10	0.23
		Component C	89.00	6.70%	0.10%	0.10%	NA	0.03	0.39
		Component D	89.00	0.04%	96.0%	0%	NA	0.15	0.00
		Component E	89.00	2.82%	97.0%	0%	NA	10.66	0.00
		Total					18.13	0.82	
908	Polyurethane Molding Line	Component G	0.48	NA	99.97%	60.00%	NA	2.08	1.25
		Component H	1.47	NA	45.00%	0%	NA	2.90	0.00
		Total	1.95					4.99	1.25
909	Polyurethane Molding Line	Component A**	113.12	61.50%	3.0%	NA	1.00	9.14	0.25
		Component B	113.12	31.16%	0.08%	0.06%	NA	0.12	0.30
		Component D	113.12	0.04%	96.0%	0%	NA	0.19	0.00
		Component E	113.12	2.82%	97.0%	0%	NA	13.55	0.00
				Total					23.01

Notes:

*The source has requested that the material names be kept confidential.

**Most of the 2,4-Toluene diisocyanate (TDI) used in foam production is consumed during the polymerization reactions; however, TDI has been detected in emissions from foam production. The emission factor is taken from a study performed in Germany in 1980, commonly known in the foam industry as the Stuttgart study, which measured TDI emissions at 0.1 pounds per ton of TDI used. A conservative estimate was made multiplying this by a factor of 10. From the EPA Manual for Best Management Practices for Pollution Prevention in the Slabstock and Molded Flexible Polyurethane Foam Industry (EPA/625/R-96/005).

Methodology

901/909 Potential to Emit VOC/HAP (ton/yr) = Maximum Rate (lb/hr) x % of Composition x % VOC/HAP Content x 8,760 (hr/yr) x 1/2,000 (ton/lb)

Component A Potential to Emit Total HAPs (ton/yr) = Maximum Rate (lb/hr) x 1/2,000 (ton/lb) x Total HAP Emission Factor (lb/ton) x 8,760 (hr/yr) x 1/2,000 (ton/lb)

908 Potential to Emit VOC/HAP (ton/yr) = Maximum Rate (lb/hr) x % VOC/HAP Content x 8,760 (hr/yr) x 1/2,000 (ton/lb)

**Appendix A: Emissions Calculations
VOC and HAP Emissions
Active Hearing Area**

Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams

Process ID	Description	Material*	Density (lb/gal)	Maximum Rate (gal/month)	VOC Content %	Total HAP Content %	Potential to Emit VOC (ton/yr)	Potential to Emit Total HAPs (ton/yr)
NA	Active Hearing Area	Component A	8.09	1.00	100%	100%	0.05	0.05
		Component B	7.70	0.03	100%	100%	1.39E-03	1.39E-03
		Component C	6.71	0.03	100%	100%	1.21E-03	1.21E-03
		Component D	6.55	1.00	100%	100%	0.04	0.04
		Component E	8.35	0.04	100%	100%	2.00E-03	2.00E-03
		Component F	8.09	0.09	100%	100%	4.37E-03	4.37E-03
		Total					0.10	0.10

Notes:

*The source has requested that the material names be kept confidential.

As a worst case emissions scenario it was assumed that all of the materials used in the active hearing area were emitted as VOC and HAP. This scenario drastically overestimates emissions from the process.

Methodology

Potential to Emit VOC/HAP (ton/yr) = Density (lb/gal) x Maximum Rate (gal/month) x % VOC/HAP Content x 12 (month/yr) x 1/2,000 (ton/lb)

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

Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Six (6) Space Heaters Two (2) Space Heaters Two (2) Space Heaters One (1) Space Heater	0.25 MMBtu/hr, each 0.2 MMBtu/hr, each 0.175 MMBtu/hr, each 0.1 MMBtu/hr
2.35	20.6		

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.03	0.06	0.86

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	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	2.162E-05	1.235E-05	7.720E-04	1.853E-02	3.500E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	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	5.147E-06	1.132E-05	1.441E-05	3.911E-06	2.162E-05

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,235	2.37E-02	2.26E-02
Summed Potential Emissions in tons/yr	1,235		
CO2e Total in tons/yr	1,243		

Total HAPs =	0.02	
Single HAP =	0.019	Hexane

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Total HAPs (ton/yr) = Sum of Organic HAPs + Sum of Metal HAPs
Single HAP (ton/yr) = Highest Organic or Metal HAP Emitted
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
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
Fugitive Dust Emissions - Paved Roads**

**Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	200.0	1.0	200.0	30.0	6,000.0	541	0.102	20.5	7,479.7
Vehicle (leaving plant) (one-way trip)	200.0	1.0	200.0	30.0	6,000.0	541	0.102	20.5	7,479.7
Totals			400.0		12,000.0			41.0	14,959.5

Average Vehicle Weight Per Trip = 30.0 tons/trip
Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5
where k =	0.011	0.0022	0.00054
W =	30.0	30.0	30.0
sL =	5.00	5.00	5.00

lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
tons = average vehicle weight (provided by source)
g/m² = silt loading value for paved roads Table 13.2.1-3*
*minimal fugitive dust generated from industrial activities at the site

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

where p = 120 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.528	0.306	0.0750	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.402	0.280	0.0688	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	5.71	1.14	0.28	5.24	1.05	0.26
Vehicle (leaving plant) (one-way trip)	5.71	1.14	0.28	5.24	1.05	0.26
Totals	11.43	2.29	0.56	10.49	2.10	0.51

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

**Appendix A: Emission Calculations
Summary of Emissions**

**Company Name: 3M Indianapolis (79th Street)
Source Address: 5457 West 79th Street, Indianapolis, Indiana 46268
Permit Number: 097-32459-00368
Reviewer: Brian Williams**

Unlimited Potential to Emit (tons/year)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAP	Single HAP
901 Polyurethane Molding Line	4.62E-04	2.18E-04	3.31E-05	0	0	18.13	0	0	0.82	0.62 Formaldehyde
908 Polyurethane Molding Line*	0	0	0	0	0	4.99	0	0	1.25	1.25 MDI
909 Polyurethane Molding Line*	0	0	0	0	0	23.01	0	0	0.55	0.30 Formaldehyde
Active Hearing Area**	0	0	0	0	0	0.10	0	0	0.10	0.04 Xylene
Natural Gas Combustion	0.02	0.08	0.08	0.01	1.03	0.06	0.86	1,243	0.02	0.019 Hexane
Paved Roads	10.49	2.10	0.51	0	0	0	0	0	0	0
Total	10.51	2.18	0.59	0.01	1.03	46.29	0.86	1,243	2.73	1.25 MDI

Methylene diphenyl diisocyanate = MDI

*Polyurethane Molding Lines 908 and 909 do not use dry materials. Therefore, no PM emissions are anticipated from these lines.

**The adhesives are applied by hand/brush, so no particulate matter is generated.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

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

TO: Amy Mooers
3M Indianapolis
7911 Zionsville Rd
Indianapolis, Indiana 46268

DATE: May 23, 2013

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

SUBJECT: Final Decision
MSOP – Transition from Title V
097-32459-00368

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Robert Hoffman, Plant Mgr./3M Indianapolis
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

May 23, 2013

TO: Pike Township Public Library

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

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

Applicant Name: 3M Indianapolis
Permit Number: 097-32459-00368

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	AWELLS 5/23/2013 3M Indianapolis 097-32459-00368 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Amy E. Mooers 3M Indianapolis 7911 Zionsville Rd Indianapolis IN 46268 (Source CAATS) confirmed delivery										
2		Robert E. Hoffman Plant Mgr 3M Indianapolis 7911 Zionsville Rd Indianapolis IN 46268 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 (Library)										
7		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
6			