INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: March 14, 2014

RE: EFP, LLC/039-33968-00099

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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

Enclosures
FNTV-PMOD.doc 6/13/2013

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Commissioner

Mr. John Eshenfelder
EFP, LLC
PO Box 2368
Elkhart, IN 46515-2368

March 14, 2014

Re: 039-33968-00099
Significant Permit Modification to
Part 70 Renewal No. T039-31304-00099

Dear Mr. Eshenfelder:

EFP, LLC was issued a Part 70 Operating Permit Renewal No. T039-31304-00099 on May 22, 2012, for a stationary polystyrene foam products manufacturing source located at 223 Middleton Run Road, Elkhart, Indiana 46516. An application requesting changes to this permit was received on December 5, 2013. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

For your convenience, the entire Part 70 Operating Permit as modified is attached.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Renee Traivaranon, of my staff, at 317-234-5615 or 1-800-451-6027, and ask for extension 4-5615.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A
IC/rt
cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section
IDEM Northern Regional Office

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Part 70 Source Permit Renewal

OFFICE OF AIR QUALITY

EFP, LLC
223 Middleton Run Road
Elkhart, Indiana 46516

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

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

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

Operation Permit No.: T039-31304-00099	
Original Signed for: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 22, 2012 Expiration Date: May 22, 2017

Significant Permit Modification No.: T039-33968-00099	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 14, 2014 Expiration Date: May 22, 2017

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polystyrene foam products manufacturing source.

Source Address:	223 Middleton Run Road, Elkhart, Indiana 46516
General Source Phone Number:	574-295-4690
SIC Code:	3086 (Plastics Foam Products)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

(a) One (1) polystyrene process, identified as polystyrene process, installed in 1962, modified in 1977, 2010, and approved for modification in 2014, consisting of four (4) pre-expanders and twelve (12) mold presses inside, capacity: 5,900 pounds of polystyrene or polystyrene/polyethylene copolymer beads per hour, exhausting outside.

(1) One (1) mold press, identified as Press No. 78, with a maximum capacity of 381 pounds of polystyrene beads per hour;

(2) One (1) mold press, identified as Press No. 82, with a maximum capacity of 457 pounds of polystyrene beads per hour; and

(3) One (1) mold press, identified as Press No. 83, with a maximum capacity of 96 pounds of polystyrene beads per hour.

Note: the above mentioned three (3) of the twelve (12) mold presses are approved for construction in 2014. Existing mold presses and pre-expanders are not individually identified.

(b) One (1) pre-expanded polypropylene process, identified as polypropylene process, installed in 1985, approved for modification in 2014 to decrease the capacity from 1,130 to 1,034 pounds of polypropylene beads per hour, exhausting inside.

(c) One (1) modified expandable polystyrene molding press, identified as Modified EPS, approved in 2013 for construction, with a maximum capacityof 636 pounds of modified polystyrene beads or 318 pounds of standard polyethylene beads per hour, equipped with no control and exhausting outside.

(d) Two (2) natural gas-fired boilers, identified as B1 and B2, installed in 1962, rated at 10.5 million British thermal units per hour, each, exhausting outside through Stacks A and B respectively.

(e) One (1) storage area, identified as expanded polystyrene bead storage, installed in 1962, capacity: 80 tons of polystyrene beads exhausting inside.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

One (1) natural gas-fired boiler, identified as B4, approved for construction in 2007, rated at 8.37 million British thermal units per hour, exhausting outside through Stack D [326 IAC 6-2-4].

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T039-31304-00099, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T039-31304-00099 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) 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.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) polystyrene process, identified as polystyrene process, installed in 1962, modified in 1977, 2010, and approved for modification in 2014, consisting of four (4) pre-expanders and twelve (12) mold presses inside, capacity: 5,900 pounds of polystyrene or polystyrene/polyethylene copolymer beads per hour, exhausting outside.

(1) One (1) mold press, identified as Press No. 78, with a maximum capacity of 381 pounds of polystyrene beads per hour;

(2) One (1) mold press, identified as Press No. 82, with a maximum capacity of 457 pounds of polystyrene beads per hour; and

(3) One (1) mold press, identified as Press No. 83, with a maximum capacity of 96 pounds of polystyrene beads per hour.

Note: the above mentioned three (3) of the twelve (12) mold presses are approved for construction in 2014. Existing mold presses and pre-expanders are not individually identified.

(b) One (1) pre-expanded polypropylene process, identified as polypropylene process, installed in 1985, approved for modification in 2014 to decrease the capacity from 1,130 to 1,034 pounds of polypropylene beads per hour, exhausting inside.

(c) One (1) modified expandable polystyrene molding press, identified as Modified EPS, approved in 2013 for construction, with a maximum capacityof 636 pounds of modified polystyrene beads or 318 pounds of standard polyethylene beads per hour, equipped with no control and exhausting outside.

(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 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

The total VOC input to the polystyrene and polypropylene processes (including the Modified EPS), using polystyrene and polyethylene beads, shall be less than 247 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC input shall be calculated by multiplying the pounds of polystyrene and/or polyethylene beads by their VOC content.

Compliance with the above requirements, in conjunction with the unrestricted potential VOC emissions from all other activities at this source (including the Modified EPS), shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

D.1.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (VOC BACT), the Best Available Control Technology for the one (1) EPS pre-expander constructed after January 1, 1980 for VOC is as follows:

(a) The average VOC content of EPS beads used in the one (1) EPS pre-expander shall not exceed 6.0%.

(b) The VOC content of the EPE beads used in the one (1) EPS pre-expander shall not exceed 12%.

(c) The source shall continue to search for material with lower VOC content. The applicant shall submit an annual report within thirty (30) days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower VOC content if the material is available.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitation contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document the compliance status with Condition D.1.2(a), the Permittee shall maintain records of the average monthly VOC content of the EPS beads used in production.

(c) To document the compliance status with Condition D.1.2(b), the Permittee shall maintain monthly records of the VOC content of the EPE beads used in production.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C-General Reporting Requirements contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Natural gas-fired boilers

(d) Two (2) natural gas-fired boilers, identified as B1 and B2, installed in 1962, rated at 10.5 million British thermal units per hour each, exhausting through Stacks A and B, respectively.

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

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

D.2.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating): emission limitations for the two (2) natural gas-fired boilers, identified as B1 and B2, installed in 1962, with heat input ratings of 10.5 million British thermal units, each, shall not exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the two (2) natural gas-fired boilers, identified as B1 and B2. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

One (1) natural gas-fired boiler, identified as B4, approved for construction in 2007, rated at 8.37 million British thermal units per hour, exhausting outside through Stack D. [326 IAC 6-2-4]

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21,1983), the allowable PM emissions from the one (1) boiler, identified as B4, shall not exceed four hundred fifty-three thousandths (0.453) pounds per million British thermal units when operating at 8.37 million British thermal units per hour heat input.

The emission limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for the one (1) natural gas-fired boiler, identified as B4. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

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

Source Name: EFP, LLC
Source Address: 223 Middleton Run Road, Elkhart, Indiana 46516
Part 70 Permit No.: T039-31304-00099

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: EFP, LLC
Source Address: 223 Middleton Run Road, Elkhart, Indiana 46516
Part 70 Permit No.: T039-31304-00099

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: EFP, LLC
Source Address: 223 Middleton Run Road, Elkhart, Indiana 46516
Part 70 Permit No.: T039-31304-00099
Facility: Polystyrene and Polypropylene Processes
Parameter: VOC Usage
Limit: Less than 247 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Source Name: EFP, LLC
Source Address: 223 Middleton Run Road, Elkhart, Indiana 46516
Part 70 Permit No.: T039-31304-00099

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

Source Name:	**EFP, LLC**
Source Location:	**223 Middleton Run Road, Elkhart, Indiana 46516**
County:	**Elkhart**
SIC Code:	**3086 (Plastics Foam Products)**
Operation Permit Renewal No.:	**T039-31304-00099**
Operation Permit Issuance Date:	**May 22, 2012**
Significant Source Modification No.:	**039-33952-00099**
Significant Permit Modification No.:	**039-33968-00099**
Permit Reviewer:	**Renee Traivaranon**

Existing Approvals

The source was issued Part 70 Operating Permit No. T039-31304-00099 on May 22, 2012. The source has since received the following approvals:

(a) Minor Source Modification No.: 039-33034-00099, issued on April 26, 2013
(b) Minor Permit Modification No.: 039-33039-00099, issued on June 5, 2013

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

(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. Elkhart 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) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

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

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

The following table is from the TSD App A of T 039 - 33039 - 00099, issued on June 5, 2013

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to this Revision (tons/year)									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHG	Total HAPs	Worst Single HAP
Modified ESP molding press	-	-	-	-	-	16.77	-	-	0.37	-
Polystyrene process	-	-	-	-	-	247.0	-	-	0.0	0.0
Boilers B1 and B2	0.175	0.699	0.699	0.06	9.198	0.51	7.73	26,106.8	0.174	(Hexane) 0.17
8.5 MMBtu/hr Boiler B4	0.07	0.279	0.279	0.022	3.66	0.20	3.079		0.23	(Hexane) 0.22
Insignificant Combustion units	0.166	0.666	0.666	0.053	8.76	0.482	7.358			
Total PTE of Entire Source	0.41	1.64	1.64	0.13	21.62	265.24	18.16	26,106.8	0.8	0.78

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because one regulated pollutant, excluding GHGs, is emitted at a rate of greater than two hundred fifty (250) tons per year, emissions of GHGs are less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by EFP, LLC on December 5, 2013, to:

(1) Add the following three (3) mold presses to the existing polystyrene process, which now comes to a total of 12 mold presses;

(a) One (1) mold press, identified as Press No. 78, with a maximum capacity of 381 pounds of polystyrene beads per hour;

(b) One (1) mold press, identified as Press No. 82, with a maximum capacity of 457 pounds of polystyrene beads per hour; and

(c) One (1) mold press, identified as Press No. 83, with a maximum capacity of 96 pounds of polystyrene beads per hour.

(2) Modify the capacity of one (1) pre-expanded polypropylene process from 1,130 to 1,034 pounds;

(3) Correct the Identification of the existing modified expandable polystyrene molding press.

(4) Include the modified EPS in the overall VOC PSD limit for the polystyrene process. This will change the status of the source from PSD major to PSD minor.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	-
PM_{10}	-
$PM_{2.5}$	-
SO_2	-
VOC	38.95
CO	-
NO_X	-
Total HAPs	-

(a) Significant Source Modification – approval to construct
This modification is subject to 326 IAC 2-7-10.5(g)(4), Significant source modification, because the potential emissions of the proposed modification are greater than 25 tons per year (tpy) for VOC.

(b) Significant Permit Modification – approval to operate
The modification will be incorporated into the Part 70 Operating Permit through a Significant Permit modification issued pursuant to 326 IAC 2-7-12(d)(1)(B) because this modification does not qualify as minor permit modifications or as administrative amendments. The potential emissions of the new mold presses and the existing Modified EPS are being added to the existing VOC PSD minor limit.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (ton/yr)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**VOC**	**CO**	**NO_X**	**GHGs**
Mold Press 78	-	-	-	-	15.89	-	-	-
Mold Press 82	-	-	-	-	19.06	-	-	-
Mold Press 83	-	-	-	-	4.00	-	-	-
Total for Modification	-	-	-	-	38.95*	-	-	-
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e

*This modification to an existing major stationary source is not significant major modification because the emissions increase is being added to the existing VOC PSD minor limit. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

PTE of the Entire Source After Issuance of this Revision

The table below summarizes the potential to emit of the entire source *(reflecting adjustment of existing limits)*, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	**Potential To Emit of the Entire Source After this Revision (tons/year)**									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHG	Total HAPs	Worst Single HAP
Modified ~~ESP~~ **EPS** molding press **(2013)**	-	-	-	-	-	~~16.77~~	-	-	~~0.37~~ **0.39**	- **0.39**
Polystyrene process **– 4 pre-expanders and 12 mold presses (1962, 1977, 2010 and 2014)**	-	-	-	-	-	247*	-	-	0.0	0.0
Boilers B1 and B2	0.175	0.699	0.699	0.06	9.198	0.51	7.73	26,106.8	0.174	(Hexane) 0.17
8.5 MMBtu/hr Boiler B4	0.07	0.279	0.279	0.022	3.66	0.20	3.079		0.23	(Hexane) 0.22
Insignificant Combustion units	0.166	0.666	0.666	0.053	8.76	0.482	7.358			
Total PTE of Entire Source	0.41	1.64	1.64	0.13	21.62	~~265.24~~ **248.47**	18.16	26,106.8	0.8	0.78
PSD Major Source	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA

Note: * Limited VOC emissions from the Existing Polystyrene process plus Mold Press 78, Mold Press 82, and Mold Press 83. The source requested that the modified EPS molding press be included the limited VOC PTE of the polystyrene process.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. *(Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)*

Process/ Emission Unit	**Potential To Emit of the Entire Source After this Revision (tons/year)**									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHG	Total HAPs	Worst Single HAP
Modified EPS molding press (2013)	-	-	-	-	-	247*	-	-	0.39	- 0.39
Polystyrene process – 4 pre-expanders and 12 mold presses (1962, 1977, 2010 and 2014)	-	-	-	-	-		-	-	0.0	0.0
Boilers B1 and B2	0.175	0.699	0.699	0.06	9.198	0.51	7.73	26,106.8	0.174	(Hexane) 0.17
8.5 MMBtu/hr Boiler B4	0.07	0.279	0.279	0.022	3.66	0.20	3.079		0.23	(Hexane) 0.22
Insignificant Combustion units	0.166	0.666	0.666	0.053	8.76	0.482	7.358			
Total PTE of Entire Source	0.41	1.64	1.64	0.13	21.62	248.47	18.16	26,106.8	0.8	0.78

Process/ Emission Unit	Potential To Emit of the Entire Source After this Revision (tons/year)									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	GHG	Total HAPs	Worst Single HAP
PSD Major Source	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA

Note: * Limited VOC emissions from the Existing Polystyrene process plus Mold Press 78, Mold Press 82, and Mold Press 83. The source requested that the modified EPS molding press be included the limited VOC PTE of the polystyrene process.

Federal Rule Applicability Determination

NSPS:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit due to this proposed modification.

NESHAP

(a) Each additional molding press is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production and Fabrication, Subpart OOOOOO, because the source does not manufacture flexible polyurethane foam products.

(b) Each additional molding press is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Fabrication Operation, Subpart MMMMM, because the source does not manufacture flexible polyurethane foam products and is not a major source of HAPs as defined in 40 CFR 63.2.

(c) Each additional molding press is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production, Subpart III, because the source does not manufacture flexible polyurethane foam products and is not a major source of HAPs.

(d) 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 due to this proposed modification.

CAM

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(a) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(b) is subject to an emission limitation or standard for that pollutant; and

(c) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Each additional molding press is not equipped with any control. Therefore, CAM does not apply to the Modified EPS molding press.

State Rule Applicability Determination

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of additional molding presses will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8 (VOC Rules)
Each additional molding press has potential VOC emissions less than 25 tons per year. Therefore, 326 IAC 8-1-6 is not applicable to each additional molding press operation. There are no limitations and standards specified in 326 IAC 8 for this type of operation.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2004, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

This is a change from the existing annual emission statement that is specified in the permit.

Compliance Determination and Monitoring Requirements

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

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

There are no new compliance determination and monitoring requirements included in the permit due to this proposed modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T039-31304-00099:

(1) The Source Status has been revised form Major to Minor for PSD.

(2) The three (3) mold presses have been added to Section A.2 Emission Units and Pollution Control Equipment Summary.

(3) The capacity of the pre-expanded polypropylene has been revised.

(4) The identification of the expandable polystyrene molding press has been corrected.

(5) The emission report has been revised from every year to every three years.

(6) Include the modified EPS in the overall VOC PSD limit for the polystyrene process. This will change the status of the source from PSD major to PSD minor.

The permit has been revised as follows with deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

....

Source Status:	Part 70 Operating Permit Program ~~Major~~ **Minor** Source, under PSD and Emission Offset Rules ....

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

(a) One (1) polystyrene process, identified as polystyrene process, installed in 1962, modified in 1977**,** ~~and~~ 2010, **and approved for modification in 2014,** consisting of four (4) pre-expanders and ~~nine (9)~~ **twelve (12)** mold presses inside, capacity: 5,900 pounds of polystyrene or polystyrene/polyethylene copolymer beads per hour, exhausting outside.

(1) One (1) mold press, identified as Press No. 78, with a maximum capacity of 381 pounds of polystyrene beads per hour;

(2) One (1) mold press, identified as Press No. 82, with a maximum capacity of 457 pounds of polystyrene beads per hour; and

(3) One (1) mold press, identified as Press No. 83, with a maximum capacity of 96 pounds of polystyrene beads per hour.

Note: the above mentioned three (3) of the twelve (12) mold presses are approved for construction in 2014. Existing mold presses and pre-expanders are not individually identified.

(b) One (1) pre-expanded polypropylene process, identified as polypropylene process, installed in 1985, **approved for modification in 2014 to decrease the** capacity from 1,130 to **1,034** pounds of polypropylene beads per hour, exhausting inside.

(c) One (1) modified expandable ~~polysterene~~ **polystyrene** molding press, identified as Modified ~~ESP~~ **EPS**, approved in 2013 for construction, with a maximum capacityof 636 pounds of modified polystyrene beads or 318 pounds of standard polyethylene beads per hour, equipped with no control and exhausting outside.

.....

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

~~Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(3) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

.....

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) polystyrene process, identified as polystyrene process, installed in 1962, modified in 1977**,** ~~and~~ 2010, **and approved for modification in 2014,** consisting of four (4) pre-expanders and ~~nine (9)~~ **twelve (12)** mold presses inside, capacity: 5,900 pounds of polystyrene or polystyrene/polyethylene copolymer beads per hour, exhausting outside.

(1) One (1) mold press, identified as Press No. 78, with a maximum capacity of 381 pounds of polystyrene beads per hour;

(2) One (1) mold press, identified as Press No. 82, with a maximum capacity of 457 pounds of polystyrene beads per hour; and

(3) One (1) mold press, identified as Press No. 83, with a maximum capacity of 96 pounds of polystyrene beads per hour.

Note: the above mentioned three (3) of the twelve (12) mold presses are approved for construction in 2014. Existing mold presses and pre-expanders are not individually identified.

(b) One (1) pre-expanded polypropylene process, identified as polypropylene process, installed in 1985, **approved for modification in 2014 to decrease the** capacity: 1,130 to **1,034** pounds of polypropylene beads per hour, exhausting inside.

(c) One (1) modified expandable ~~polysterene~~ **polystyrene** molding press, identified as Modified ~~ESP~~ **EPS**, approved in 2013 for construction, with a maximum capacityof 636 pounds of modified polystyrene beads or 318 pounds of standard polyethylene beads per hour, equipped with no control and exhausting outside.

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

The total VOC input to the polystyrene and polypropylene processes (~~excluding~~ **including** the Modified ~~ESP~~**EPS**), using polystyrene and polyethylene beads, shall be less than 247 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC input shall be calculated by multiplying the pounds of polystyrene and/or polyethylene beads by their VOC content.

Compliance with the above requirements, in conjunction with the unrestricted potential VOC emissions from all other activities at this source (~~excluding~~ **including** the Modified ~~ESP~~**EPS**), shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-33952-00099 and Significant Permit Modification No. 039-33968-00099. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon 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) 233-6868 or toll free at 1-800-451-6027 extension (3-6868).

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Summary

Company Name: EFP, LLC
Address City IN Zip: 223 Middleton Run Road, Elkhart, Indiana 46514
Significant Source Modification No.: T 039-33952-00099
Significant Permit Modification No.: T 039-33968-00099
Reviewer: Renee Traivaranon
Date: January 2, 2014

	Potential Emissions									
	Tons per year									
Emission Units	**PM**	**PM10**	**PM2.5**	**VOC**	**SO2**	**Nox**	**CO**	**GHG as CO2e**	**Single HAP**	**HAPs**
Mold Press 78	------	------	------	15.89	------	------	------	------	------	------
Mold Press 82	------	------	------	19.06	------	------	------	------	------	------
Mold Press 83	------	------	------	4.00	------	------	------	------	------	------
Polystyrene Process*	------	------	------	3101.045	------	------	------	------	------	------
EPS molding press	------	------	------	16.77	------	------	------	------	0.39	0.39
Boilers B1, B2	0.17	0.70	0.70	0.51	0.06	9.20	7.73	26,106.79	0.17	0.17
8.5 MMBtu/hr Boiler B4	0.07	0.28	0.28	0.48	0.02	3.67	3.08		0.22	0.23
Insignificant Combustion	0.17	0.67	0.67	0.48	0.05	8.76	7.36			
Total	**0.41**	**1.64**	**1.64**	**3,119.28**	**0.13**	**21.62**	**18.16**	**26,106.79**	**0.78**	**0.80**

	Limited/ Controlled Emissions									
	Tons per year									
Emission Units	PM	PM10	PM2.5	VOC	SO2	Nox	CO	GHG as CO2e	Single HAP	HAPs
Mold Press 78	------	------	------	247.00	------	------	------	------	------	------
Mold Press 82	------	------	------		------	------	------	------	------	------
Mold Press 83	------	------	------		------	------	------	------	------	------
Polystyrene Process*	------	------	------		------	------	------	------	------	------
EPS molding press	------	------	------		------	------	------	------	0.39	0.39
Boilers B1, B2	0.17	0.70	0.70	0.51	0.06	9.20	7.73	26,106.79	0.17	0.17
8.5 MMBtu/hr Boiler B4	0.07	0.28	0.28	0.48	0.02	3.67	3.08		0.22	0.23
Insignificant Combustion	0.17	0.67	0.67	0.48	0.05	8.76	7.36			
Total	**0.41**	**1.64**	**1.64**	**248.47**	**0.13**	**21.62**	**18.16**	**26,106.79**	**0.78**	**0.80**

* Existing polystyrene process with 9 mold presses

Appendix A : Emissions Calculations
VOC Emissions from the Polystyrene Process

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Emission Unit	Max Usage Rate (lbs/hr)	Max Usage Rate (lbs/day)	Weight % (Pentane) VOC	Uncontrolled PTE VOC (tons/yr)
Polystyrene Process				
Polystyrene Beads	5,900	141,600	6.80%	1757.26
Polyethylene Beads	5,900	141,600	12.00%	3101.04
Pre-Expanded Polypropylene Process	1,034	24,816	0.0001%	0.00453
			Total	3101.045

*Emissions are based on Worst Case Beads Used Polyethylene-highest VOC content as determined in Title V Renewal T039-19601-00099.

Methodology:
Uncontrolled PTE VOC (tons/yr) = (Max Usage Rate lb/hr * 365 days/ year *VOC weight %) /2000 pounds/ ton

Appendix A: Emissions Calculations
VOC Emissions from the Press No. 78

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Emission Unit	Max Capacity Rate	VOC	Molding Loss	Molding Process PTE
		(Pentane)	% VOC Loss	VOC Emissions
	(lbs/hr)	%	%	(tons/yr)
Polystyrene Process				
Press No. 78	381	6.80%	14%	15.89
Note: above information was provided by the source			**Total**	**15.89**

Methodology

Molding Process PTE Emissions = (Max Capacity Rate (lb/hr) * 8,760 (hours/year) * VOC/HAP weight % * %VOC/HAP Loss)/2000 (lb/ton)

Molding Process VOC Loss Percentage determined by EPA Guidance Document, "Control of VOC Emissions from Polystyrene Foam Manufacturing", September 1990, Document EPA-450/3-90-020.

Appendix A: Emissions Calculations
VOC Emissions from the Press No. 82

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Emission Unit	Max Capacity Rate	VOC	Molding Loss	Molding Process PTE
		(Pentane)	% VOC Loss	VOC Emissions
	(lbs/hr)	%	%	(tons/yr)
Polystyrene Process				
Press No. 82	457	6.80%	14%	19.06
Note: above information provided by source			**Total**	**19.06**

Methodology

Molding Process PTE Emissions = (Max Capacity Rate (lb/hr) * 8,760 (hours/year) * VOC/HAP weight % * %VOC/HAP

Molding Process VOC Loss Percentage determined by EPA Guidance Document, "Control of VOC Emissions from Polystyrene Foam Manufacturing", September 1990, Document EPA-450/3-90-020.

Appendix A: Emissions Calculations
VOC Emissions from the Press No. 83

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Emission Unit	Max Capacity Rate	VOC	Molding Loss	Molding Process PTE
		(Pentane)	% VOC Loss	VOC Emissions
	(lbs/hr)	%	%	(tons/yr)
Polystyrene Process				
Press No. 83	96	6.80%	14%	4.00
Note: above information provided by source			**Total**	**4.00**

Methodology

Molding Process PTE Emissions = (Max Usage Rate (lb/hr) * 8,760 (hours/year) * VOC/HAP weight % * %VOC/HAP

Molding Process VOC Loss Percentage determined by EPA Guidance Document, "Control of VOC Emissions from Polystyrene Foam Manufacturing", September 1990, Document EPA-450/3-90-020.

Appendix A: Emissions Calculations

VOC and HAP Emissions from the Proposed Modified EPS Molder

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Emission Unit	Max Usage Rate	VOC	Molding Loss	Molding Process PTE
		(Pentane)	% VOC Loss	VOC Emissions
	(lbs/hr)	%	%	(tons/yr)
Polystyrene Process				
Modified Polystyrene Beads	636	4.30%	14%	16.77
Or				
Standard Polyethylene Beads	318	6.80%		13.26
Totals				**16.77**

Emission Unit	Max Usage Rate	HAP	Molding Loss	Molding Process PTE
		Benzene	% HAP Loss	HAP Emissions
	(lbs/hr)	%	%	(tons/yr)
Polystyrene Process				
Modified Polystyrene Beads	636	0.10%	14%	0.39
Or				
Standard Polyethylene Beads	318	--		--
Totals				**0.39**

Methodology

Worst Case Scenario of Using Modified or Standard EPS Beads Used.

Molding Process PTE Emissions = (Max Usage Rate (lb/hr) * 8,760 (hours/year) * VOC/HAP weight % * %VOC/HAP Loss)/2000 (lb/ton)

Molding Process cannot be used without other emission loss points.

Molding Process VOC Loss Percentage determined by EPA Guidance Document, "Control of VOC Emissions from Polystyrene Foam Manufacturing", September 1990, Document EPA-450/3-90-020.

Appendix A : Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Industrial Boilers B1 and B2

Company Name: **EFP, LLC**
Address City IN Zip: **223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.: **T 039-33952-00099**
Significant Permit Modification No.: **T 039-33968-00099**
Reviewer: **Renee Traivaranon**
Date: **January 2, 2014**

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
10.5	Boiler B1	92.0
10.5	Boiler B2	92.0
21.0	**Total**	**184.0**

Pollutant	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	**0.175**	**0.699**	**0.699**	**0.055**	**9.20**	**0.506**	**7.73**

Boilers B1 and B2 are capable of burning only natural gas.
The two (2) natural gas fired boilers, identified as B1 and B2 do not have a capability to burn No. 2 fuel oil because the fuel oil burners are not opera
and the source has no intention of replacing them; therefore, potential emissions from No. 2 fuel usage were not calculated.
*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
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
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80	0.00340
Potential Emission in tons/yr	**0.00019**	**0.00011**	**0.00690**	**0.16556**	**0.00031**

HAPs - Metals

	Lead	Cadmium	Chromium	e	Nickel	
Emission Factor in lb/MMcf	0.00050	0.00110	0.00140	0.00038	0.00210	
Potential Emission in tons/yr	**0.00005**	**0.00010**	**0.00013**	**0.00003**	**0.00019**	**Total HAPs** **0.174**

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion - Boiler B4 and space heaters

Company Name: EFP, LLC
Address City IN Zip: 223 Middleton Run Road, Elkhart, Indiana 46514
Significant Source Modification No.: T 039-33952-00099
Significant Permit Modification No.: T 039-33968-00099
Reviewer: Renee Traivaranon
Date: January 2, 2014

One (1) insignificant natural gas-fired boiler, rated at 8.37 million British thermal units per hour.
Insignificant space heaters, rated at 20 million British thermal units per hour total.

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
20.0	Space heaters	175.2
8.37	Boiler B4	73.32
28.4	**Total**	**249**

	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr (space heaters)	0.166	0.666	0.666	0.053	8.760	0.482	7.358
Potential Emission in tons/yr (Boiler B4)	0.070	0.279	0.279	0.022	3.666	0.202	3.079
Total	**0.236**	**0.944**	**0.944**	**0.075**	**12.426**	**0.683**	**10.438**

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
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 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.075	1.80	0.00340
Potential Emission in tons/yr	**0.000261**	**0.000149**	**0.009320**	**0.223669**	**0.000422**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	**0.00006**	**0.00014**	**0.00017**	**0.00005**	**0.00026**	**0.235**

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Source wide combustion CO2e emissions potential

Company Name:	**EFP, LLC**
Address City IN Zip:	**223 Middleton Run Road, Elkhart, Indiana 46514**
Significant Source Modification No.:	**T 039-33952-00099**
Significant Permit Modification No.:	**T 039-33968-00099**
Reviewer:	**Renee Traivaranon**
Date:	**January 2, 2014**

	MMBtu/hr	MMCF/yr
Space heaters	20	
Boiler B4	8.37	
Boiler B1, B2	21	
Combined Maximum Capacity	49.37	432.48

Greenhouse Gas Emissions

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000.00	2.3	2.2
Existing furnaces and boilers -PTE in tons/yr	25,948.87	0.50	0.48

Summed Existing Furnaces and boilers Potential Emissions in tons/yr	25,949.85
Existing Furnaces and boilers -CO2e in tons/yr	**26,106.79**

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: John Eshenfelder
EFP, LLC
PO Box 2368
Elkhart, IN 46515-2368

DATE: March 14, 2014

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

SUBJECT: Final Decision
Significant Permit Modification to Part 70 Renewal
«Permit_Number»

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:
Douglas Thorp, Responsible Official
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 6/13/2013

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

March 14, 2014

TO: Elkhart Public Library

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

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

Applicant Name: EFP LLC
Permit Number: 039-33968-00099

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 6/13/2013

Mail Code 61-53

IDEM Staff	PWAY 3/14/2014 EFP LLC 039-33968-00099 (final)			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	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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		John Eshenfelder EFP LLC PO Box 2368 Elkhart IN 46515-2368 (Source CAATS)									
2		Douglas Thorp Acting President EFP LLC PO Box 2368 Elkhart IN 46515-2368 *(RO CAATS)*									
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 *(Local Official)*									
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 *(Library)*									
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
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