



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: September 26, 2014

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

Source Name: Autoneum North America, Inc.

Permit Level: New Source Construction & Federally Enforceable State Operating Permit

Permit Number: 019-34572-00145

Source Location: 100 River Ridge Parkway, Jeffersonville, Indiana

Type of Action Taken: Initial Permit

### **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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 34572.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

*(continues on next page)*

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

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

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

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

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



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# New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY


**Autoneum North America, Inc.  
100 River Ridge Parkway  
Jeffersonville, Indiana 47130**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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

Operation Permit No. F019-34572-00145	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2014  Expiration Date: September 26, 2019

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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 2-8-3(b)]

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The Permittee owns and operates a stationary fiber insulating and sound deadening material production facility.

Source Address:	100 River Ridge Parkway, Jeffersonville, Indiana 47130
General Source Phone Number:	269-921-0219
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Clark
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) fiber line, identified as EU1, approved in 2014 for construction, with a maximum capacity of 3,500 pounds per hour, consisting of the following units:
  - (1) Seven (7) bail breakers, using a baghouse for particulate matter control, and exhausting to stack SV3.
  - (2) One (1) steam oven, powered by a natural gas fired boiler with a maximum heat input capacity of 5 MMBtu/hr, and exhausting to stack SV1.
  - (3) One (1) natural gas fired oven, with a maximum heat input capacity of 0.6 MMBtu/hr, and exhausting to stack SV2.

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

---

This stationary source also includes the following insignificant activities:

- (a) One (1) RUS conversion molding line, identified as EU2, approved in 2014 for construction, consisting of four (4) mold units, with a maximum capacity of 1116 pounds per hour of fiber, and each individually exhausting to stacks SV4, SV5, SV6 and SV7.
- (b) One (1) ECO conversion molding line, identified as EU3, approved in 2014 for construction, consisting of three (3) presses, with a maximum capacity of 1215 pounds per hour of fiber, and each individually exhausting to stacks SV8, SV9, and SV10.
- (c) One (1) carpet line, identified as EU4, approved in 2014 for construction, consisting of two (2) IR ovens, each with a maximum capacity of 1400 pounds per hour of fiber, and each individually exhausting to stacks SV11 and SV12.

- (d) Six (6) natural gas fired space heaters, identified as EU5 through EU10, approved in 2014 for construction, each with a maximum heat input capacity of 0.6 MMBtu/hr.
- (e) One (1) cold cleaner degreaser, identified as EU11, approved for construction in 2014, with a maximum capacity of 30 gallons per year.

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

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

## SECTION B

## GENERAL CONDITIONS

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

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

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

---

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

---

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

---

- (a) This permit, F019-34572-00145, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

### B.6 Enforceability [326 IAC 2-8-6] [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.7 Severability [326 IAC 2-8-4(4)]**

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

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

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

**B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

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

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

**B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast 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  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

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

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

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F019-34572-00145 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a

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

Request for renewal shall be submitted to:

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

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

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**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

**B.21 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.



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

**B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

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

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

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

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

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

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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 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, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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 2-8-4] [40 CFR 68]**

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

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

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

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

- (1) monitoring results;
- (2) review of operation and maintenance procedures and records; and/or
- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

**Stratospheric Ozone Protection**

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

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



## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) fiber line, identified as EU1, approved in 2014 for construction, with a maximum capacity of 3,500 pounds per hour, consisting of the following units:
  - (1) Seven (7) bail breakers, using a baghouse for particulate matter control, and exhausting to stack SV3.
  - (2) One (1) steam oven, powered by a natural gas fired boiler with a maximum heat input capacity of 5 MMBtu/hr, and exhausting to stack SV1.
  - (3) One (1) natural gas fired oven, with a maximum heat input capacity of 0.6 MMBtu/hr, and exhausting to stack SV2.

### Insignificant Activities:

- (a) One (1) RUS conversion molding line, identified as EU2, approved in 2014 for construction, consisting of four (4) mold units, with a maximum capacity of 1116 pounds per hour of fiber, and each individually exhausting to stacks SV4, SV5, SV6 and SV7.
- (b) One (1) ECO conversion molding line, identified as EU3, approved in 2014 for construction, consisting of three (3) presses, with a maximum capacity of 1215 pounds per hour of fiber, and each individually exhausting to stacks SV8, SV9, and SV10.
- (c) One (1) carpet line, identified as EU4, approved in 2014 for construction, consisting of two (2) IR ovens, each with a maximum capacity of 1400 pounds per hour of fiber, and each individually exhausting to stacks SV11 and SV12.
- (d) Six (6) natural gas fired space heaters, identified as EU5 through EU10, approved in 2014 for construction, each with a maximum heat input capacity of 0.6 MMBtu/hr.

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

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

### D.1.1 PM, PM<sub>10</sub>, PM<sub>2.5</sub> Emission Limitations [326 IAC 2-2] [326 IAC 2-3] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions (after control) from the bail breakers shall not exceed the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hour)	PM <sub>10</sub> Emission Limit (lbs/hour)	PM <sub>2.5</sub> Emission Limit (lbs/hour)
Bail Breakers	Baghouse	56.39	22.14	22.14

Compliance with these limits, combined with the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM emissions from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Program), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.

#### D.1.2 Particulate Matter (PM) Limitation [326 IAC 6.5]

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- (a) Pursuant to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), particulate emissions from the fiber line, bail breakers, natural gas fired oven, RUS conversion molding, ECO conversion molding, carpet line, and six(6) natural gas space heaters shall not exceed 0.03 grains per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), particulate emissions from the natural gas fired boiler shall not exceed 0.01 grains per dry standard cubic foot (dscf).

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Particulate Control

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- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouse associated with the bail breakers shall be operated at all times that the bail breakers are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notifications shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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The Permittee shall comply with the following:

- (a) Within 60 days after achieving the maximum production of the bail breakers, but not later than 180 days after initial startup of the bail breakers, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM10, and PM2.5 testing of the bail breakers, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.
- (b) Within 60 days after achieving the maximum production of the fiber line (EU1), RUS conversion molding line (EU2), ECO conversion molding line (EU3), and carpet line (EU4), but not later than 180 days after initial startup, the Permittee shall perform a one-time performance test to verify the uncontrolled emission rates for PM, PM10, PM2.5, VOC, formaldehyde, and phenol from the fiber line steam oven (EU1), one (1) of the mold units in the RUS conversion molding line (EU2), one (1) of the presses in the ECO conversion molding line (EU3), and one (1) of the IR ovens in the carpet line (EU4), utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

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

### **D.1.6 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouse associated with the bail breakers, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

### **D.1.7 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

### **D.1.8 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the bail breakers. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2

## OPERATION CONDITIONS

### Emissions Unit Description:

### Insignificant Activities:

- (e) One (1) cold cleaner degreaser, identified as EU11, approved for construction in 2014, with a maximum capacity of 30 gallons per year.

(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 2-8-4(1)]

#### D.2.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

**D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

**D.2.3 Record Keeping Requirements**

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To document the compliance status with Condition D.1.3, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.
- (c) The type of solvent purchased.
- (d) The total volume of the solvent purchased.
- (e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

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

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

Source Name: Autoneum North America, Inc.  
Source Address: 100 River Ridge Parkway, Jeffersonville, Indiana 47130  
FESOP Permit No.: F019-34572-00145

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Autoneum North America, Inc.  
Source Address: 100 River Ridge Parkway, Jeffersonville, Indiana 47130  
FESOP Permit No.: F019-34572-00145

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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



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

Source Name: Autoneum North America, Inc.  
Source Address: 100 River Ridge Parkway, Jeffersonville, Indiana 47130  
FESOP Permit No.: F019-34572-00145

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ 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:**

Page 2 of 2

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

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

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

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

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

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

Autoneum North America, Inc.  
100 River Ridge Parkway  
Jeffersonville, Indiana 47130

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Autoneum North America, Inc. 100 River Ridge Parkway, Jeffersonville, Indiana 47130, completed construction of the fiber insulating and sound deadening material production facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 23, 2014 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F019-34572-00145, Plant ID No. 019-00145 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Addendum to the Technical Support Document (ATSD) for a  
New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)

<b>Source Background and Description</b>
--

<b>Source Name:</b> <b>Source Location:</b> <b>County:</b> <b>SIC Code:</b> <b>Operation Permit No.:</b> <b>Permit Reviewer:</b>	<b>Autoneum North America, Inc.</b> <b>100 River Ridge Parkway, Jeffersonville, IN 47130</b> <b>Clark</b> <b>3714 (Motor Vehicle Parts and Accessories)</b> <b>F019-34572-00145</b> <b>Brian Wright</b>
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On July 30, 2014, the Office of Air Quality (OAQ) had a notice published in the Clark County Evening News, Jeffersonville, Indiana, stating that Autoneum North America, Inc. had applied for a New Source Construction and FESOP to construction and operation of a new stationary fiber insulating and sound deadening material production facility. The notice also stated that the OAQ proposed to issue a New Source Construction and FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

<b>Comments and Responses</b>
-------------------------------

On August 26, 2014, Jim Euler of DECA Environmental submitted, on behalf of Autoneum, comments to IDEM, OAQ on the draft New Source Construction and FESOP.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Mr. Euler submitted the following comments requesting descriptive changes to the several units:

1. D.1 Emission Unit Description (a)(2): Please add "... **and exhausting to SV1.**" To the end of the sentence.
2. D.1 Emission Unit Description (a)(3): Please add "... **and exhausting to SV2.**" To the end of the sentence.
3. D.1 Emission Unit Description Insignificant Activities: (a): Please add "... **and each individually exhausting to SV4, SV5, SV6 and SV7.**" To the end of the sentence.
4. D.1 Emission Unit Description Insignificant Activities: (b): Please add "... **and each individually exhausting to SV8, SV9, SV10.**" To the end of the sentence.
5. D.1 Emission Unit Description Insignificant Activities: (c): Please change the sentence "One (1) carpet line, identified as EU4, approved in 2014 for construction, **consisting of two IR ovens, each with a maximum capacity of 2800 1400 pounds per hour of fiber, each individually exhausting to SV11 and SV12.**"

### Response to Comment 1:

IDEM agrees with the recommended changes, since they are descriptive in nature, and make no changes to potential emissions or applicable requirements. The permit has been revised as follows:

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

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

- (a) One (1) fiber line, identified as EU1, approved in 2014 for construction, with a maximum capacity of 3,500 pounds per hour, consisting of the following units:
  - (1) Seven (7) bail breakers, using a baghouse for particulate matter control, and exhausting to stack SV3.
  - (2) One (1) steam oven, powered by a natural gas fired boiler with a maximum heat input capacity of 5 MMBtu/hr, **and exhausting to stack SV1.**
  - (3) One (1) natural gas fired oven, with a maximum heat input capacity of 0.6 MMBtu/hr, **and exhausting to stack SV2.**

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

This stationary source also includes the following insignificant activities:

- (a) One (1) RUS conversion molding line, identified as EU2, approved in 2014 for construction, consisting of four (4) mold units, with a maximum capacity of 1116 pounds per hour of fiber, **and each individually exhausting to stacks SV4, SV5, SV6 and SV7.**
- (b) One (1) ECO conversion molding line, identified as EU3, approved in 2014 for construction, consisting of three (3) presses, with a maximum capacity of 1215 pounds per hour of fiber, **and each individually exhausting to stacks SV8, SV9, and SV10.**
- (c) One (1) carpet line, identified as EU4, approved in 2014 for construction, **consisting of two (2) IR ovens, each** with a maximum capacity of ~~1400~~**2800** pounds per hour of fiber, **and each individually exhausting to stacks SV11 and SV12.**

\*\*\*

### SECTION D.1

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (a) One (1) fiber line, identified as EU1, approved in 2014 for construction, with a maximum capacity of 3,500 pounds per hour, consisting of the following units:
  - (1) Seven (7) bail breakers, using a baghouse for particulate matter control, and exhausting to stack SV3.
  - (2) One (1) steam oven, powered by a natural gas fired boiler with a maximum heat input capacity of 5 MMBtu/hr, **and exhausting to stack SV1.**
  - (3) One (1) natural gas fired oven, with a maximum heat input capacity of 0.6 MMBtu/hr, **and exhausting to stack SV2.**

Insignificant Activities:

- (a) One (1) RUS conversion molding line, identified as EU2, approved in 2014 for construction, consisting of four (4) mold units, with a maximum capacity of 1116 pounds per hour of fiber, **and each individually exhausting to stacks SV4, SV5, SV6 and SV7.**
- (b) One (1) ECO conversion molding line, identified as EU3, approved in 2014 for construction, consisting of three (3) presses, with a maximum capacity of 1215 pounds per hour of fiber, **and each individually exhausting to stacks SV8, SV9, and SV10.**
- (c) One (1) carpet line, identified as EU4, approved in 2014 for construction, **consisting of two (2) IR ovens, each** with a maximum capacity of **14002800** pounds per hour of fiber, **and each individually exhausting to stacks SV11 and SV12.**

\*\*\*

**Comment 2:**

In addition to the comments listed above, Mr. Euler submitted the following comments requesting changes to the stack testing requirements included in the permit:

- 6. D.1.5 (a) Testing Requirements: Since there is no source of combustion and the fiber bail breakers are at ambient temperature, we request the elimination of the requirement to test for condensable since it will be very expensive to prove what we already know. We spoke with Jarrod Fisher of Compliance Data and he agreed.
- 7. D.1.5(b) Testing Requirements: Please remove the requirement to test for phenol and formaldehyde. Dr. Stephan Koenigbauer of Autoneum, Corp Chemist, has verified that the material does not contain phenol or formaldehyde. The previous emission factors are from a unit which used a phenolic resin for 20 years and in 2006 when the test was conducted, off-gassing of the emissions occurred even after discontinued use of the resin. The equipment to be installed in Jeffersonville will be new and the phenolic resin is not part of the production process.
- 8. D.1.5(b) Testing Requirements: Per our discussions, Autoneum is requesting the testing of the fiber line be eliminated due to the reasons stated in item 7 above.
- 9. D.1.5(b) Testing Requirements: Please change the first sentence as follows to identify which units need to be tested since there are duplicate emission units for each EU:

"Within 60 days after achieving the maximum production of the fiber line **oven** (EU1), RUS conversion molding line (EU2), ECO conversion molding line (EU3), and carpet line (EU4), but not later than 180 days after initial startup, the Permittee shall perform a one-time performance test to verify the uncontrolled emission rates for PM, PM10, PM2.5, VOC, ~~formaldehyde, and phenol~~ from the fiber line **oven** (EU1), RUS conversion molding line **(one of the heated presses)** (EU2), ECO conversion molding line **(one of the heated presses)** (EU3), and carpet line **(one of the IR ovens)** (EU4), utilizing methods approved by the Commissioner.

- 10. D.1.5(b) Testing Requirements: Per our discussions, Autoneum is requesting the testing of the fiber line be eliminated due to the reasons stated in item 7 above.

**Response to Comment 2:**

The permit reviewer discussed these comments in depth with the Compliance and Enforcement Branch, and requested additional information from the source on the design/operational similarities of the units associated with each of the production lines. A response was received on September 24, 2014 that verified that the individual units on in each of the production lines were identical and operated at identical temperatures. The fiber line oven, each of the four (4) mold units associated with the RUS conversion molding line, and each of the three (3) presses

associated with the ECO conversion molding line operate at a temperature of 350°F. Each of the two (2) IR ovens associated with the carpet line operate at a temperature of 400°F. The source has also requested in subsequent comments to withdraw the request to remove phenol and formaldehyde testing requirements from the permit.

Based on the discussion with Compliance and Enforcement Branch and additional information from the source, IDEM disagrees with the removal of testing for PM, PM10, PM2.5, VOC, formaldehyde, and phenol, since there is the potential that these pollutants could be emitted at the elevated temperatures within the process units. Since the units in each production line are designed/operated identically, the request to only test one unit in each production line is approved. IDEM has revised Condition D.1.5 of the permit as follows:

**D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

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The Permittee shall comply with the following:

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- (b) Within 60 days after achieving the maximum production of the fiber line (EU1), RUS conversion molding line (EU2), ECO conversion molding line (EU3), and carpet line (EU4), but not later than 180 days after initial startup, the Permittee shall perform a one-time performance test to verify the uncontrolled emission rates for PM, PM10, PM2.5, VOC, formaldehyde, and phenol from the fiber line **steam oven (EU1), one (1) of the mold units in the RUS conversion molding line (EU2), one (1) of the presses in the ECO conversion molding line (EU3), and one (1) of the IR ovens in the carpet line (EU4)**, utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

**Comment 3:**

TSD page 2 of 10. This sentence is not clear. "Clark County has been classified as attainment or unclassifiable in Indiana for *list the pollutants*."

**Response to Comment 3:**

This was a typo in the TSD that should have read "Clark County has been classified as attainment or unclassifiable in Indiana for **all other criteria pollutants**." This had no impact on the requirements of the permit, and no change is necessary.

**Comment 4:**

D.1.6 Parametric Monitoring: Please change the pressure drop range to 2.0 – 8.0. This has been an acceptable range for past permits and due to not knowing the operational range of the new equipment, this range should help maintain compliance until the stack test is performed.

**Response to Comment 4:**

IDEM agrees with the proposed change since the pressure drop range proposed by the source has been used in permits for similar sources. The permit has been changed as follows:

**D.1.6 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouse associated with the bail breakers, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall

take a reasonable response. The normal range for this unit is a pressure drop between ~~2.0 3.0~~ and ~~8.0 6.0~~ inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed FESOP can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the permit 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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.



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

**Technical Support Document (TSD) for a New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)**

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Autoneum North America, Inc.</b>
<b>Source Location:</b>	<b>100 River Ridge Parkway, Jeffersonville, IN 47130</b>
<b>County:</b>	<b>Clark</b>
<b>SIC Code:</b>	<b>3714 (Motor Vehicle Parts and Accessories)</b>
<b>Operation Permit No.:</b>	<b>F019-34572-00145</b>
<b>Permit Reviewer:</b>	<b>Brian Wright</b>

On May 23, 2014, the Office of Air Quality (OAQ) received an application from Autoneum North America, Inc. related to the construction and operation of a new stationary fiber insulating and sound deadening material production facility.

<b>Existing Approvals</b>
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There have been no previous approvals issued to this source.

<b>County Attainment Status</b>
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The source is located in Clark County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Clark County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct

PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

- (e) Other Criteria Pollutants  
Clark County has been classified as attainment or unclassifiable in Indiana for list the 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.

#### **Background and Description of New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by on May 23, 2014, relating to the construction and operation of a new stationary fiber insulating and sound deadening material production facility.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) fiber line, identified as EU1, approved in 2014 for construction, with a maximum capacity of 3,500 pounds per hour, consisting of the following units:
- (1) Seven (7) bail breakers, using a baghouse for particulate matter control, and exhausting to stack SV3.
  - (2) One (1) steam oven, powered by a natural gas fired boiler with a maximum heat input capacity of 5 MMBtu/hr.
  - (3) One (1) natural gas fired oven, with a maximum heat input capacity of 0.6 MMBtu/hr.
- (b) Insignificant activities consisting of the following:
- (1) One (1) RUS conversion molding line, identified as EU2, approved in 2014 for construction, consisting of four (4) mold units, with a combined maximum capacity of 1116 pounds per hour of fiber.
  - (2) One (1) ECO conversion molding line, identified as EU3, approved in 2014 for construction, consisting of three (3) presses, with a combined maximum capacity of 1215 pounds per hour of fiber.
  - (3) One (1) carpet line, identified as EU4, approved in 2014 for construction, with a combined maximum capacity of 2800 pounds per hour of fiber.
  - (4) Six (6) natural gas fired space heaters, identified as EU5 through EU10, approved in 2014 for construction, each with a maximum heat input capacity of 0.6 MMBtu/hr.
  - (5) One (1) cold cleaner degreaser, identified as EU6, approved for construction in 2014, with a maximum capacity of 30 gallons per year.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

### Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	272.37
PM10 <sup>(1)</sup>	272.60
PM2.5 <sup>(1)</sup>	272.60
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.95
VOC	3.97
CO	3.32
GHGs as CO <sub>2</sub> e	4769

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Phenol	3.31
Formaldehyde	3.33
Hexane	0.07
<b>TOTAL HAPs</b>	<b>6.84</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

### PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e* *	Total HAPs	Worst Single HAP
Bail Breaking***	246.99	96.97	96.97	0.00	0.00	0.00	0.00	0	0.00	0.00
Fiber Line	0.84	0.84	0.84	0.00	0.00	0.39	0.00	0	4.12	2.07 Formaldehyde
Insignificant Activities	1.22	1.44	1.44	0.02	3.95	3.58	3.32	4769	2.72	1.27 Formaldehyde
<b>Total PTE of Entire Source</b>	<b>249.05</b>	<b>99.26</b>	<b>99.26</b>	<b>0.02</b>	<b>3.95</b>	<b>3.97</b>	<b>3.32</b>	<b>4769</b>	<b>6.84</b>	<b>3.33 Formaldehyde</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA	NA
<p>*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".</p> <p>**The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.</p> <p>***Bail Breaking PM/PM10/PM2.5 emissions are after FESOP and PSD Minor emission limitations.</p>										

(a) FESOP, PSD and Emission Offset Minor Status

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions (after control) shall not exceed the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hour)	PM10 Emission Limit (lbs/hour)	PM2.5 Emission Limit (lbs/hour)
Bail Breakers	Baghouse	56.39	22.14	22.14

Compliance with these limits, combined with the potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM emissions from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Program), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.

In order to comply with these limits, the baghouse must be in operation at all times while the bail breakers are in operation.

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

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the natural gas-fired boiler has a maximum heat input capacity of less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Wool Fiberglass Insulation Manufacturing Plants, 40 CFR 60, Subpart PPP (326 IAC 12), are not included in the permit, since the facility is not a wool fiberglass manufacturing line as defined by 40 CFR 60.681. The insulation material is not manufactured at the facility.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since the cold cleaner degreaser does not use any solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these as described in 40 CFR 63.460.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wool Fiberglass Manufacturing, 40 CFR 63, Subpart NNN (326 IAC 20-47), are not included in the permit, since this source does not manufacture fiberglass and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Industrial Boiler and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit, since the facility is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Industrial Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in this permit, since the boiler is a gas-fired boiler as defined by 40 CFR 63.11237.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

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

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)  
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

Bail Breakers

- (j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the seven (7) bail breakers are not subject to 326 IAC 6-3 because they are regulated under 326 IAC 6.5.
- (k) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), the particulate emissions from the seven (7) bail breakers shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

The baghouse shall be in operation at all times the bail breakers are in operation, in order to comply with this limit.

Fiber Line

- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the fiber line are not subject to 326 IAC 6-3 because they are regulated under 326 IAC 6.5.
- (m) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the fiber line shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).
- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The fiber line (EU1) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the fiber line is less than twenty-five (25) tons per year.

Molding

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the RUS Conversion Molding line (EU2) and ECO Conversion Molding line (EU3) are not subject to 326 IAC 6-3 because they are regulated under 326 IAC 6.5.
- (p) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), particulate from the RUS Conversion Molding line (EU2) and ECO Conversion Molding line (EU3) shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).
- (q) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The RUS Conversion Molding line (EU2) and ECO Conversion Molding line (EU3) are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.

Carpet Lines

- (r) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the carpet lines are not subject to 326 IAC 6-3 because they are regulated under 326 IAC 6.5.
- (s) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the carpet line (EU4) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).
- (t) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The carpet line (EU4) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the fiber line is less than twenty-five (25) tons per year.

### Natural Gas Combustion

- (u) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.  
  
Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the natural gas fired oven and six (6) natural gas space heaters shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).  
  
Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) emissions from the natural gas-fired boiler shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).
- (v) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The natural gas-fired units are each not subject to the requirements of 326 IAC 6-3, since each is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (w) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired units are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.
- (x) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The natural gas-fired units are each not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

### Cold Cleaner Degreaser

- (y) 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)  
Pursuant to 326 IAC 8-3-1(c), the cold cleaner degreaser (EU11) is subject to 326 IAC 8-3-2(a) and (b) since it is a cold cleaner degreaser installed after 1990 and does not have a remote solvent reservoir. The Permittee shall:
  - (a) Ensure the following control equipment and operating requirements are met:
    - (1) Equip the degreaser with a cover.
    - (2) Equip the degreaser with a device for draining cleaned parts.
    - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
    - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
    - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
    - (6) Store waste solvent only in closed containers.
    - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.



- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.
- (z) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)  
 Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit (Control)	Operating Parameters	Frequency
Bail Breakers (Baghouse)	Pressure Drop	Once per day

These monitoring conditions are necessary because the baghouse used in conjunction with the must operate properly to ensure continued compliance with 326 IAC 2-8 (FESOP) and the limits that render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.

- (b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Bail Breakers	Baghouse	PM, PM10, PM2.5	Within 60 days after achieving the maximum production of the bail breakers, but no later than 180 days after initial startup of the bail breakers	Once every five (5) years
Fiber Line (EU1)	None	PM, PM10, PM2.5, VOC, formaldehyde, and phenol	Within 60 days after achieving the maximum production of EU1, EU2, EU3, and EU4, but no later than 180 days after initial startup of EU1, EU2, EU3, and EU4	Once
RUS Conversion Molding Line (EU2)	None	PM, PM10, PM2.5, VOC, formaldehyde, and phenol		Once
ECO Conversion Molding Line (EU3)	None	PM, PM10, PM2.5, VOC, formaldehyde, and phenol		Once
Carpet Line (EU4)	None	PM, PM10, PM2.5, VOC, formaldehyde, and phenol		Once

The Permittee shall perform PM, PM<sub>10</sub>, and PM<sub>2.5</sub> testing of the baghouse associated with the bail breakers utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days after initial startup of the bail breakers in order to demonstrate compliance with the PM, PM10, and PM2.5 limits.

The Permittee has proposed alternative emission factors for the fiber line (EU1), RUS conversion molding line (EU2), ECO conversion molding line (EU3), and carpet line (EU4). No later than 180 days after initial startup, the Permittee shall perform a one-time performance test to verify the uncontrolled emission rates for PM, PM10, PM2.5, VOC, formaldehyde, and phenol from the fiber line (EU1), RUS conversion molding line (EU2), ECO conversion molding line (EU3), and carpet line (EU4) in order to document the validity of the alternate emission factors.

#### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 23, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F019-34572-00145. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Emissions Summary**

Page 1 of 8 TSD App A

**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

**Uncontrolled/Unlimited Potential to Emit (PTE) (tons/year)**

Emission Units	PM	PM-10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Phenol	Formaldehyde	Hexane
Bail Breaking	270.31	270.31	270.31	0.00	0.00	0.00	0.00	0	0.00	0.00	0.00	0.00
Fiber Line	0.84	0.84	0.84	0.00	0.00	0.39	0.00	0	4.12	2.05	2.07	0.00
RUS Conversion Molding	0.90	0.90	0.90	0.00	0.00	0.55	0.00	0	0.43	0.31	0.12	0.00
ECO Conversion Molding	0.00	0.00	0.00	0.00	0.00	0.60	0.00	0	0.60	0.34	0.13	0.00
Carpet Lines	0.24	0.24	0.24	0.00	0.00	2.12	0.00	0	1.62	0.60	1.02	0.00
Natural Gas	0.08	0.30	0.30	0.02	3.95	0.22	3.32	4769	0.07	0.00	0.00	0.07
Degreaser	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0	0.00	0.00	0.00	0.00
<b>Total</b>	<b>272.37</b>	<b>272.60</b>	<b>272.60</b>	<b>0.02</b>	<b>3.95</b>	<b>3.97</b>	<b>3.32</b>	<b>4769</b>	<b>6.84</b>	<b>3.31</b>	<b>3.33</b>	<b>0.07</b>

**Limited Potential to Emit (PTE) (tons/year)**

Emission Units	PM	PM-10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Phenol	Formaldehyde	Hexane
Bail Breaking	246.99	96.97	96.97	0.00	0.00	0.00	0.00	0	0.00	0.00	0.00	0.00
Fiber Line	0.84	0.84	0.84	0.00	0.00	0.39	0.00	0	4.12	2.05	2.07	0.00
RUS Conversion Molding	0.90	0.90	0.90	0.00	0.00	0.55	0.00	0	0.43	0.31	0.12	0.00
ECO Conversion Molding	0.00	0.00	0.00	0.00	0.00	0.60	0.00	0	0.60	0.34	0.13	0.00
Carpet Lines	0.24	0.24	0.24	0.00	0.00	2.12	0.00	0	1.62	0.60	1.02	0.00
Natural Gas	0.08	0.30	0.30	0.02	3.95	0.22	3.32	4769	0.07	0.00	0.00	0.07
Degreaser	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0	0.00	0.00	0.00	0.00
<b>Total</b>	<b>249.05</b>	<b>99.26</b>	<b>99.26</b>	<b>0.02</b>	<b>3.95</b>	<b>3.97</b>	<b>3.32</b>	<b>4769</b>	<b>6.84</b>	<b>3.31</b>	<b>3.33</b>	<b>0.07</b>

**Controlled Potential to Emit (PTE) (tons/year)**

Emission Units	PM	PM-10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Phenol	Formaldehyde	Hexane
Bail Breaking	2.70	2.70	2.70	0.00	0.00	0.00	0.00	0	0.00	0.00	0.00	0.00
Fiber Line	0.84	0.84	0.84	0.00	0.00	0.39	0.00	0	4.12	2.05	2.07	0.00
RUS Conversion Molding	0.90	0.90	0.90	0.00	0.00	0.55	0.00	0	0.43	0.31	0.12	0.00
ECO Conversion Molding	0.00	0.00	0.00	0.00	0.00	0.60	0.00	0	0.60	0.34	0.13	0.00
Carpet Lines	0.24	0.24	0.24	0.00	0.00	2.12	0.00	0	1.62	0.60	1.02	0.00
Natural Gas	0.08	0.30	0.30	0.02	3.95	0.22	3.32	4769	0.07	0.00	0.00	0.07
Degreaser	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0	0.00	0.00	0.00	0.00
<b>Total</b>	<b>4.77</b>	<b>4.99</b>	<b>4.99</b>	<b>0.02</b>	<b>3.95</b>	<b>3.97</b>	<b>3.32</b>	<b>4769</b>	<b>6.84</b>	<b>3.31</b>	<b>3.33</b>	<b>0.07</b>

**Appendix A: Emissions Calculations  
Bail Breaking Operations**

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**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

Process Throughput Weight (tons/hr)	Design Maximum Air Flow Rate (acfm)	Overall Control Efficiency Rating	Design Outlet Grain Loading (gr/acf)
0.05	24000	99.00%	0.003

**Potential to Emit (PTE) of PM/PM10/PM2.5**

PTE of PM/PM10/PM2.5 After Controls (lb/hr)	PTE of PM/PM10/PM2.5 After Controls (tons/year)	PTE of PM/PM10/PM2.5 Before Controls (lb/hr)	PTE of PM/PM10/PM2.5 Before Controls (tons/year)	FESOP and PSD Minor Limits			
				PM Limit (lb/hour)	Limited PTE of PM (tons/year)	PM10/PM2.5 Limits (lb/hour)	Limited PTE of PM10/PM2.5 (tons/year)
0.62	2.70	61.71	270.31	56.39	246.99	22.14	96.97

**Methodology**

PTE of PM/PM10/PM2.5 After Controls (lb/hr) = Air Flow Rate (acfm) x Grain Loading (gr/acf) x 60 (minutes/hour) x (1 lb/7000 grains)  
PTE of PM/PM10/PM2.5 After Controls (tons/year) = PTE of PM/PM10/PM2.5 After Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)  
PTE of PM/PM10/PM2.5 Before Controls (lb/hr) = PTE of PM/PM10/PM2.5 After Controls (lb/hr) x (1 - control efficiency)  
PTE of PM/PM10/PM2.5 Before Controls (tons/year) = PTE of PM/PM10/PM2.5 Before Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

**Appendix A: Emissions Calculations  
VOC & HAP emissions**

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**Fielong Fiber Line Steam Oven and Gas Oven combined emissions**

**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

**Emission Factors\***

	E.F. (lb/lb)
PM	5.51E-05
PM10	5.51E-05
VOC	2.53E-05
Formaldehyde	1.35E-04
Phenol	1.34E-04
Ammonia	1.87E-04

**Capacity**

	Capacity lbs/hr
Fiber Line	3500
<b>Total</b>	<b>3500</b>

**Total Uncontrolled Potential Emissions for Fiber Line Steam Oven and Gas Oven (combined)**

Pollutant	Total PTE	
	lbs/hr	tons/yr
PM	0.193	0.845
PM10	0.193	0.845
VOC	0.089	0.388
Formaldehyde	4.73E-01	2.070
Phenol	0.469	2.054
Ammonia	0.655	2.867
<b>Total HAPs</b>		<b>4.124</b>

**Methodology**

\*Emission Factors from the Oregon OH plant stack test in 2006. The emissions were sampled prior to controls.

Emissions (lbs/hr)= Throughput (lbs/hr) x Emission Factor (lb/lb)

Emissions (tons/yr)= Emissions (lbs/hr) x 8760 hours x 1 ton/2,000lb

**Appendix A: Emissions Calculations  
VOC & HAP emissions  
RUS Conversion Molding**

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**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

**Emission Factors\***

	E.F. (lb/lb)
PM	1.85E-04
PM10/PM2.5	1.85E-04
VOC	1.12E-04
VOC from mold release	NA
Formaldehyde	2.41E-05
Phenol	6.35E-05

**Capacities**

Mold	Capacity lbs/hr
Mold #1	279
Mold #2	279
Mold #3	279
Mold #4	279
<b>Total</b>	<b>1116</b>

**Total Uncontrolled Potential to Emit for Molds #1 through #4 (combined)**

Pollutant	Total PTE	
	lb/hr	tons/yr
PM	0.206	0.904
PM10/PM2.5	0.206	0.904
VOC	0.125	0.547
VOC from mold release	NA	
Formaldehyde	0.027	0.118
Phenol	0.071	0.310
<b>Total HAPs</b>		<b>0.428</b>

**Methodology**

\*Emission Factors from the Oregon OH plant stack test in 2006. The emissions were sampled prior to controls.  
Emissions (lbs/hr)= Throughput (lbs/hr) x Emission Factor (lb/lb)  
Emissions (tons/yr)= Emissions (lbs/hr) x 8760 hours x 1 ton/2,000lb

**Appendix A: Emissions Calculations  
VOC & HAP emissions  
ECO+ Conversion Molding**

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**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

**Emission Factors\***

	E.F. (lb/lb)
VOC/OC	1.12E-04
Phenol	6.35E-05
Formaldehyde	2.41E-05
Ammonia	5.69E-05

**Capacities**

Press	Capacity lbs/hr	Capacity tons/yr
Press 1	405	1,774
Press 2	405	1,774
Press 3	405	1,774
<b>Total</b>	<b>1215</b>	<b>5,322</b>

**Total Uncontrolled Potential to Emit for Heated Presses 1 through 3 (combined)**

Pollutant	Total PTE	
	lb/hr	tons/yr
PM	0.000	0.000
VOC	0.136	0.596
Phenol	0.077	0.338
Form	0.029	0.128
Ammonia	0.069	0.303
<b>Total HAPs</b>	<b>0.106</b>	<b>0.106</b>

**Methodology**

\*Emission Factors from the Oregon OH plant stack test in 2006. The emissions were sampled prior to controls.  
Emissions (lbs/hr)= Throughput (lbs/hr) x Emission Factor (lb/lb)  
Emissions (tons/yr)= Emissions (lbs/hr) x 8760 hours x 1 ton/2,000lb

**Appendix A: Emissions Calculations  
Delta Matic IR Ovens**

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**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

**Emission Factors\*** Preheat Ovens

	Total (lb/lb)
Filterable PM	1.94E-05
VOC/OC	1.73E-04
Phenol	4.92E-05
Formaldehyde	8.28E-05
Ammonia	5.69E-05

**Capacities**

IR Oven	Capacity lbs/hr	Capacity lb/yr
IR Oven #1	1400	12,264,000
IR Oven #2	1400	12,264,000
<b>Total</b>	<b>2800</b>	

Capacity for 1 oven	lb/part	part/hour	Capacity lb/hr
	35	40	1400

**Total Uncontrolled Potential to Emit for IR Ovens #1 and #2 (combined)**

	Total PTE	
Pollutant	lb/hr	tons/yr
PM/PM10/PM2.5	0.054	0.238
VOC	0.484	2.122
Phenol	0.138	0.603
Form	0.232	1.015
Ammonia	0.159	0.698
<b>Total HAPs</b>		<b>1.619</b>

**Methodology**

\*Emission Factors from the Oregon OH plant stack test in 2006. The emissions were sampled prior to controls.

Emissions (lbs/hr)= Throughput (lbs/hr) x Emission Factor (lb/lb)

Emissions (tons/yr)= Emissions (lbs/hr) x 8760 hours x 1 ton/2,000lb



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

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**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

Unit	Number	Capacity per unit (MMBtu/hr)	Total Capacity (MMBtu/hr)
Boiler	1	5	5
Gas Oven	1	0.6	0.6
Space Heaters	6	0.6	3.6
<b>Total</b>			<b>9.2</b>

HHV
mmBtu
mmscf
<b>1020</b>

Potential Throughput
MMCF/yr
<b>79.0</b>

	Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.08	0.30	0.30	0.02	3.95	0.22	3.32

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**HAPS Calculations**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	<b>Total - Organics</b>
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	8.3E-05	4.7E-05	3.0E-03	0.07	1.3E-04	<b>0.07</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	<b>Total - Metals</b>
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	2.0E-05	4.3E-05	5.5E-05	1.5E-05	8.3E-05	<b>2.2E-04</b>
					<b>Total HAPs</b>	<b>0.07</b>
					<b>Worst HAP</b>	<b>0.07</b>

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.

**Greenhouse Gas Calculations**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	4,741	0.1	0.1
Summed Potential Emissions in tons/yr	4,741		
CO2e Total in tons/yr	4,769		

**Methodology**

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

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Global 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 (25) + N2O

Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations**  
**Degreaser**

Page 8 of 8 TSD App A

**Company Name:** Autoneum North America, Inc.  
**Source Address:** 100 River Ridge Parkway, Jeffersonville, IN 47130  
**Permit Number:** F019-34572-00145  
**Reviewer:** Brian Wright

Degreasing Operations	Solvent Used	Maximum Usage (gallons/year)	Density (lbs/gallon)	Weight % VOC	VOC Emissions (ton/yr)
Degreaser	Mineral Spirits	30	6.43	100%	0.10

**Methodology**

VOC Emissions (tons/yr) = [Maximum Usage (gallons/yr)] \* [Density (lbs/gallon)] \* [Weight % VOC] / [2000 lbs/ton]



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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Phil Williamson  
Autoneum North America Incorporated  
100 River Ridge Parkway  
Jeffersonville, IN 47130

DATE: September 26, 2014

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

SUBJECT: Final Decision  
New Source Construction & FESOP  
019-34572-00145

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:  
Jim Euler – DECA Environmental & Associates, Inc.  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

September 26, 2014

TO: Sellersburg Public Library

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

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


**Applicant Name: Autoneum North America, Inc.**  
**Permit Number: 019-34572-00145**

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	GHOTOPP 9/26/2014 Autoneum North America Incorporated 019-34572-00145 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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											Remarks
1		Phil Williamson Autoneum North America Incorporated 100 River Ridge Parkway Jeffersonville IN 47130 (Source CAATS) via confirmed delivery									
2		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)									
3		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)									
4		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)									
5		Sellersburg Public Library 430 N Indiana Ave Sellersburg IN 47172 (Library)									
6		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)									
7		Jim Euler DECA Environmental & Associates, Inc. 410 1st Ave. NE Carmel IN 46032 (Consultant)									
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)									
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