



# 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

**Carol S. Comer**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Momentive Performance Materials USA, LLC in DeKalb County

Significant Permit Revision No.: 033-37468-00075

The Indiana Department of Environmental Management (IDEM) has received an application from Momentive Performance Materials USA, LLC, located at 420 North Taylor Road, Garrett, Indiana, for a significant revision of its FESOP issued on July 9, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Momentive Performance Materials USA, LLC to make certain changes at its existing source. Momentive Performance Materials USA, LLC has applied to construct and operate one (1) new mixing process, relocate an existing mixer, and remove a mixer.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Garrett Public Library  
107 West Houston Street  
Garrett, IN 46746

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will

make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 033-37468-00075 in all correspondence.

**Comments should be sent to:**

Brian Williams  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5375  
Or dial directly: (317) 234-5375  
Fax: (317) 232-6749 attn: Brian Williams  
E-mail: bwilliam@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Williams or my staff at the above address.



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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**Michael R. Pence**  
Governor

**DRAFT**

**Carol S. Comer**  
Commissioner

Mr. James D Bilimek  
Momentive Performance Materials USA, LLC  
420 North Taylor Road  
Garrett, IN 46738

Re: 033-37468-00075  
Significant Revision to  
F033-31439-00075

Dear Mr. Bilimek:

Momentive Performance Materials USA, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F033-31439-00075, on July 9, 2012, for a stationary customized and specialty silicone elastomers manufacturing operation located at 420 North Taylor Road, Garrett, Indiana. On August 2, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate one (1) new mixing process, relocate an existing mixer, and remove a mixer. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction and/or modification at the source:

- (a) One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:
  - (1) One (1) 2,200 pound raw material storage silo, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building.
  
- (b) One (1) batch mixing operation, identified as Compounding, approved in 2016 for modification, including nine (9) mixing processes consisting of:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005 and approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5, with particulate emissions controlled by a baghouse identified as BH5, exhausting inside the building.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Brian Williams, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - County Name County  
County Name County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northern Regional Office



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

**Momentive Performance Materials USA, LLC  
420 N. Taylor Rd.  
Garrett, Indiana 46738**

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

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

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

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

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

Administrative Amendment No.: 033-35029-00075, issued on October 29, 2014

Administrative Amendment No.: 033-36038-00075, issued on July 20, 2015

Significant Permit Revision No.: 033-37468-00075	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: July 9, 2022



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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)]

---

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

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

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

---

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

One (1) polydimethylsiloxane mixing operation consisting of:

- (a) One (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, equipped with an integral pneumatic bin filter system;
- (b) One (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, equipped with an integral pneumatic bin filter system;
- (c) One (1) mixing process, identified as Mixing Process #1, constructed in 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building;
- (d) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
  - (1) Two (2) 2,200 pound raw material storage silos, with no control;
  - (2) One (1) transfer conveyor system; and
  - (3) One (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2

- and BH9, exhausting emissions outside the building;
- (e) One (1) mixing process, identified as Mixing Process #3, constructed prior to 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
- (1) Three (3) 2,200 pound raw material silos, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building;
- (f) One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:
- (1) One (1) 2,200 pound raw material storage silo, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building.
- (g) One (1) batch mixing operation, identified as Compounding, approved in 2016 for modification, including nine (9) mixing processes consisting of:
- (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005 and approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5, with particulate emissions controlled by a baghouse identified as BH5, exhausting inside the building.
  - (2) Two (2) mixers, identified as Mixer #4 and Mixer #6 with nominal mixer volumes of 10 and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #4 and Mixer #6 were constructed prior to 2002.
  - (3) One (1) mixer with a nominal mixer volume of 300 gallons, identified as Mixer #8. Particulate emissions from this mixer are controlled by a baghouse identified as BH8, exhausting inside the building; Mixer # 8 was constructed in 2006. Mixing operations include a bag dump station and a bulk bag unloading unit.
  - (4) One (1) mixer with a nominal mixer volume of 500 gallons, identified as Mixer #10. Particulate emissions from this mixer are controlled by a baghouse identified as BH7, exhausting inside the building; Mixer #10 was constructed in 2003. Mixing operations include a 2,200 pound raw material storage silo, a bag dump station and a bulk bag unloading unit.
  - (5) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

This stationary source also includes the following insignificant activities:

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

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

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

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

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

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

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

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

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

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

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

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

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

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- (a) All terms and conditions of permits established prior to F033-31439-00075 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C.2 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), 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.

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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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]**

- (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]**

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

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

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

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
  
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
  
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
  
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- One (1) polydimethylsiloxane mixing operation consisting of:
- (a) One (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, equipped with an integral pneumatic bin filter system;
  - (b) One (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, equipped with an integral pneumatic bin filter system;
  - (c) One (1) mixing process, identified as Mixing Process #1, constructed in 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
    - (1) Two (2) 2,200 pound raw material storage silos, with no control;
    - (2) One (1) pneumatic conveyor system; and
    - (3) One (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building;
  - (d) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
    - (1) Two (2) 2,200 pound raw material storage silos, with no control;
    - (2) One (1) transfer conveyor system; and
    - (3) One (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building;
  - (e) One (1) mixing process, identified as Mixing Process #3, constructed prior to 2002, modified in 2010, modified in 2015 to install baghouse BH9, consisting of:
    - (1) Three (3) 2,200 pound raw material silos, with no control;
    - (2) One (1) pneumatic conveyor system; and
    - (3) One (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building;
  - (f) One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:
    - (1) One (1) 2,200 pound raw material storage silo, with no control;
    - (2) One (1) pneumatic conveyor system; and
    - (3) One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses

identified as BH2 and BH9, exhausting emissions outside the building.

- (g) One (1) batch mixing operation, identified as Compounding, approved in 2016 for modification, including nine (9) mixing processes consisting of:
- (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005 and approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5, with particulate emissions controlled by a baghouse identified as BH5, exhausting inside the building.
  - (2) Two (2) mixers, identified as Mixer #4 and Mixer #6 with nominal mixer volumes of 10 and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #4 and Mixer #6 were constructed prior to 2002.
  - (3) One (1) mixer with a nominal mixer volume of 300 gallons, identified as Mixer #8. Particulate emissions from this mixer are controlled by a baghouse identified as BH8, exhausting inside the building; Mixer # 8 was constructed in 2006. Mixing operations include a bag dump station and a bulk bag unloading unit.
  - (4) One (1) mixer with a nominal mixer volume of 500 gallons, identified as Mixer #10. Particulate emissions from this mixer are controlled by a baghouse identified as BH7, exhausting inside the building; Mixer #10 was constructed in 2003. Mixing operations include a 2,200 pound raw material storage silo, a bag dump station and a bulk bag unloading unit.
  - (5) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

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

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

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the VOC emissions from each of the five (5) mixing operations shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

- (a) The individual HAP generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total HAP generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total VOC generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of VOC shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The allowable PM10 and PM2.5 emission rate from each mixing process after control shall be limited as follows:

Unit ID / Description	Control Description	Limited PM10 (lbs/hr)	Limited PM2.5 (lbs/hr)
Mixer #1 (Mixing Process 1)	BH2 or BH9	3.31	3.31
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
HB Mixer-4 (Mixing Process 4)			
LSR Mixer #1 (Compounding Operation)	BH3	2.65	2.65
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

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

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

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

Unit ID / Description	Control	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)
Mixer #1 (Mixing Process 1)	BH2 or BH9	0.726	3.31
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
HB Mixer-4 (Mixing Process 4)			
LSR Mixer #1 (Compounding Operation)	BH3	0.523	2.65
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

Unit ID / Description	Control	Process	Allowable Rate
Mixer #4 (Compounding Operation)	BH5	0.436	2.35
Mixer #6 (Compounding Operation)			
Mixer #11 (Compounding Operation)			
Mixer #10 (Compounding Operation)	BH7	0.750	3.38
Mixer #8 (Compounding Operation)	BH8	0.750	3.38

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

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

$$P = \text{process weight rate in tons per hour}$$

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

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

A Preventive Maintenance Plan is required for the mixing processes and the control devices identified as BH2, BH3, and BH9. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.5 Particulate Control**

- (a) In order to comply with Conditions D.1.2(d) and D.1.3, either of the two (2) baghouses identified as BH2 and BH9 and the baghouse BH3 for particulate control shall be in operation and control emissions at all times when filler material is being added to a mixer or when filler material is being blended into a mix.
- (b) The integral pneumatic bin filter system that is associated with each silo shall be in operation and control emissions at all times when loading fume silica into the Treated Fume Silica Storage Silo and Untreated Fume Silica Storage Silo.
- (c) 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 notification 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.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination

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

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

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

where:

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

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

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

where:

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

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

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

##### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses identified as BH2 and BH9 shall be performed during normal daylight operations when the associated mixing processes 1, 2, 3, and 4 are in operation and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps.-Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across the baghouses (identified as BH2, BH3, and BH9) used in conjunction with the mixing processes, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall take reasonable response steps. The normal range for these units 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 or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.1.9 Broken or Failed Bag Detection

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- (a) For a single compartment baghouses 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)][326 IAC 2-8-16]**

#### D.1.10 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
  - (1) The total weight of each VOC generating material used at each mixing process 1, 2, 3, and 4 and the Compounding Operation each calendar month; and emissions of VOC each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used except as provided in paragraph (2) below.

- (2) The total VOC generating material input and the emissions of VOC for each compliance period. If the combined emissions of VOC in the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation).
  - (3) The total weight of each HAP generating material used by mixing processes 1, 2, 3, and 4 and the Compounding Operation each calendar month; and emissions of individual and total HAPs each calendar month, as determined utilizing the equation specified in Condition D.1.6.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the baghouse (identified as BH2, BH3, and BH9) exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
  - (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the baghouses (identified as BH2, BH3, and BH9) used in conjunction with the mixing processes. The Permittee shall include in its daily record when a pressure a drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
  - (d) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.11 Reporting Requirements

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

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

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

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

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

- (a) Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements, the owner or operator of a cold cleaner degreaser shall ensure that 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 cover whenever articles are not being handled in the degreaser.
  - (4) Drain cleaned articles 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 could allow greater than twenty percent (20%) of the waste solvent by weight to evaporate.
- (b) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall 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 that 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), 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 Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]**

##### **D.2.3 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.2, 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.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records 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: Momentive Performance Materials USA, LLC  
Source Address: 420 N. Taylor Rd., Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

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

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12.

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

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

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

Page 2 of 2

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

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 1  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the emissions of VOC shall be limited to less than 25.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 2  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the emissions of VOC shall be limited to less than 25.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 3  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the emissions of VOC shall be limited to less than 25.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Mixing process 4  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 4, including associated clean-up activities, shall be limited such that the emissions of VOC shall be limited to less than 25.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: Compounding Operation  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to the Compounding Operation, including associated clean-up activities, shall be limited such that the emissions of VOC shall be limited to less than 25.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: The five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation)  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the emissions of shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: The five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation)  
Parameter: Total HAP emissions  
Limit: The total HAP emissions from the mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-31439-00075  
Facility: The five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation)  
Parameter: The individual HAP emissions  
Limit: The individual HAP emissions from the four (4) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Description and Location**

<b>Source Name:</b>	<b>Momentive Performance Materials USA, LLC</b>
<b>Source Location:</b>	<b>420 North Taylor Road, Garrett, IN 46738</b>
<b>County:</b>	<b>DeKalb</b>
<b>SIC Code:</b>	<b>3069 (Fabricated Rubber Products)</b>
<b>Operation Permit No.:</b>	<b>F 033-31439-00075</b>
<b>Operation Permit Issuance Date:</b>	<b>July 9, 2012</b>
<b>Significant Permit Revision No.:</b>	<b>033-37468-00075</b>
<b>Permit Reviewer:</b>	<b>Brian Williams</b>

On August 2, 2016, the Office of Air Quality (OAQ) received an application from Momentive Performance Materials USA, LLC related to a modification to an existing stationary customized and specialty silicone elastomers manufacturing operation.

**Existing Approvals**

The source was issued FESOP Renewal No. F033-31439-00075 on July 9, 2012. The source has since received the following approvals:

- (a) Administrative Amendment No. 033-35029-00075, issued on October 29, 2014; and
- (b) Administrative Amendment No. 033-36038-00075, issued on July 20, 2015.

**County Attainment Status**

The source is located in DeKalb County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
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>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 DeKalb County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 DeKalb County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of Administrative Amendment No. 033-36038-00075, issued on July 20, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM <sub>10</sub> <sup>* (1)</sup>	PM <sub>2.5</sub> <sup>** (1)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Mixer #1 (Mixing Process 1) (BH2/BH9)	66.71	11.49	11.49	-	-	<90.0 <sup>(2)</sup>	-	<24.0 <sup>(2)</sup>	<9.00 <sup>(2)</sup>
Mixer #2 (Mixing Process 2) (BH2/BH9)				-	-		-		
Mixer #3 (Mixing Process 3) (BH2/BH9)				-	-		-		
Mixer #11 (Compounding Operation) (BH2/BH9)				-	-		-		
LSR Mixer #1 (Compounding Operation) (BH3)	45.81	11.61	11.61	-	-		-		
LSR Mixer #2 (Compounding Operation) (BH3)				-	-		-		
LSR Mixer #3 (Compounding Operation) (BH3)				-	-		-		
LSR Mixer #4 (Compounding Operation) (BH3)				-	-		-		
Mixer #4 (Compounding Operation) (BH5)	4.98	4.98	4.98	-	-		-		
Mixer #6 (Compounding Operation) (BH5)				-	-		-		
Mixer #9 (Compounding Operation) (BH5)				-	-	-			
Mixer #10 (Compounding Operation) (BH7)	6.57	6.57	6.57	-	-	-			

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM <sub>10</sub> * (1)	PM <sub>2.5</sub> ** (1)	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Mixer #8 (Compounding Operation) (BH8)	6.57	6.57	6.57	-	-		-		
Untreated Fume Silica Storage Silo (Integral Bin Filter)	0.09	0.09	0.09	-	-	-	-	-	-
Treated Fume Silica Storage Silo (Integral Bin Filter)	0.09	0.09	0.09	-	-	-	-	-	-
Raw Material Storage Silos	1.28	1.28	1.28	-	-	-	-	-	-
Insignificant Combustion	0.08	0.08	0.08	0.03	4.38	0.24	3.68	0.08	0.08 Hexane
<b>Total PTE of Entire Source</b>	<b>132.18</b>	<b>42.76</b>	<b>42.76</b>	<b>0.03</b>	<b>4.38</b>	<b>&lt;90.24</b>	<b>3.68</b>	<b>&lt;24.08</b>	<b>&lt;9.00</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 (1) PM10 and PM2.5 emissions for the batch mixers, conveyors, and material loading are limited by 326 IAC 6-3 and 3216 IAC 2-8-4 (FESOP). Unlimited PTE calculations are in an IDEM, OAQ confidential file. Baghouses BH3 and either BH2 or BH9 are required to operate for control.  
 (2) Pursuant to 326 IAC 2-8-4 (FESOP), ingredient materials used by the four (4) mixing operations shall be limited such that emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year. These are existing requirements.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Momentive Performance Materials USA, LLC on August 2, 2016, relating to the following changes:

- (a) The source has requested to construct and operate one (1) new mixing process, identified as Mixing Process #4. This new process consists of one (1) uncontrolled storage silo, one (1) pneumatic conveyor system, and one (1) mixer, which will be controlled by the existing parallel baghouses, identified as BH2 and BH9. The new mixer is the same model and design as Mixers #1 and #2 and this mixer will be located in the space that Mixer #11 currently occupies.
- (b) Due to the addition of the new mixer, the existing Mixer #11 will be relocated to the Compounding Room and placed where Mixer #9 is currently located. Mixer #11 was previously controlled by baghouses BH2 and BH9, but due to this relocation, it will now be controlled by the existing baghouse, identified as BH5. This relocation will not increase the unlimited potential to emit from Mixer #11.
- (c) Mixer #9 will be removed from the source due to the addition of the new Mixer Process #4 and relocation of the existing Mixer #11.

- (d) Due to the modifications described above, the source has requested to modify the existing PM10 and PM2.5 FESOP minor limits for baghouses BH2 and BH9. In addition, the new mixing process, will limit the VOC emissions to less than twenty-five (25) tons per year to render 326 IAC 8-1-6 (VOC BACT) not applicable. Finally, the new mixing process will be included in the existing VOC and HAPs FESOP limits. IDEM has revised the potential to emit calculations in Appendix A based on the information provided by the source.

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

- (a) One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:
- (1) One (1) 2,200 pound raw material storage silo, with no control;
  - (2) One (1) pneumatic conveyor system; and
  - (3) One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building.
- (b) One (1) batch mixing operation, identified as Compounding, approved in 2016 for modification, including nine (9) mixing processes consisting of:
- (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005 and approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5, with particulate emissions controlled by a baghouse identified as BH5, exhausting inside the building.

The following emission unit will be removed from the source:

- (a) One (1) batch mixing operation, identified as Compounding, including ten (10) mixing processes consisting of:
- (1) One (1) mixer, identified as Mixer #9 with nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; Mixer #9 was constructed prior to 2002.

<b>“Integral Part of the Process” Determination</b>
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As part of FESOP Renewal No. 033-22847-00075, issued on January 22, 2008, IDEM, OAQ previously determined that the pneumatic bin filter system for the one (1) 60,000 pound bulk Treated Fume Silica storage silo, constructed in 2002, be considered integral to the process.

As part of FESOP Administrative Amendment No. 033-29013-00075, issued on March 17, 2010, IDEM, OAQ previously determined that the pneumatic bin filter system for the one (1) 60,000 pound bulk Untreated Fume Silica storage silo, constructed in 2010, be considered integral to the process. IDEM, OAQ is not reevaluating these integral justifications at this time. Therefore, the potential PM, PM10, and PM2.5 emissions from the treated and untreated fume silica storage silos will continue to be calculated after consideration of the pneumatic bin filter systems for purposes of determining permitting level. In 2016, and upon further evaluation, OAQ has determined that 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 applicability is to include the consideration of the integral particulate controls. Effective in this revision IDEM will consider the emissions after the integral controls for the purposes of determining the applicability of these rules. Operating conditions in the proposed revision will continue to specify that the pneumatic bin filter systems shall operate at all times when the treated and untreated fume silica storage silos are in operation.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
HB Mixer #4 (Mixing Process 4)	30.40	30.40	30.40	-	-	62.68	-	-	-
<b>Total PTE of Proposed Revision</b>	<b>30.40</b>	<b>30.40</b>	<b>30.40</b>	-	-	<b>62.68</b>	-	-	-

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of a new process with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

- (i) PM, PM10, or direct PM2.5; and
- (ii) Volatile Organic Compounds (VOC).

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adjusting existing FESOP limits.

**PTE of the Entire Source After Issuance of the FESOP Revision**

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM <sub>10</sub> <sup>*(1)</sup>	PM <sub>2.5</sub> <sup>** (1)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Mixer #1 (Mixing Process 1) (BH2/BH9)				-	-		-		
Mixer #2 (Mixing Process 2) (BH2/BH9)	<del>66.71</del>	<del>41.49</del>	<del>41.49</del>	-	-	≤90.0 <sup>(2)</sup>	-	≤24.0 <sup>(2)</sup>	≤9.00 <sup>(2)</sup>
Mixer #3 (Mixing Process 3) (BH2/BH9)	<b>95.44</b>	<b>14.49</b>	<b>14.49</b>	-	-		-		
Mixer #11 (Compounding Operation) (BH2/BH9)				-	-		-		

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM <sub>10</sub> * (1)	PM <sub>2.5</sub> ** (1)	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
<b>HB Mixer-4 (Mixing Process 4) (BH2/BH9)</b>									
LSR Mixer #1 (Compounding Operation) (BH3)				-	-		-		
LSR Mixer #2 (Compounding Operation) (BH3)	<del>45.81</del> <b>45.77</b>	<del>41.61</del> <b>11.62</b>	<del>41.61</del> <b>11.62</b>	-	-		-		
LSR Mixer #3 (Compounding Operation) (BH3)				-	-		-		
LSR Mixer #4 (Compounding Operation) (BH3)				-	-		-		
Mixer #4 (Compounding Operation) (BH5)				-	-		-		
Mixer #6 (Compounding Operation) (BH5)	<del>4.98</del> <b>5.33</b>	<del>4.98</del> <b>5.33</b>	<del>4.98</del> <b>5.33</b>	-	-		-		
<del>Mixer #9 (Compounding Operation) (BH5)</del>				-	-		-		
<b>Mixer #11 (Compounding Operation) (BH5)</b>									
Mixer #10 (Compounding Operation) (BH7)	6.57	6.57	6.57	-	-		-		
Mixer #8 (Compounding Operation) (BH8)	6.57	6.57	6.57	-	-		-		
Untreated Fume Silica Storage Silo (Integral Bin Filter)	<del>0.09</del> <b>0.10</b>	<del>0.09</del> <b>0.10</b>	<del>0.09</del> <b>0.10</b>	-	-	-	-	-	-
Treated Fume Silica Storage Silo (Integral Bin Filter)	<del>0.09</del> <b>0.10</b>	<del>0.09</del> <b>0.10</b>	<del>0.09</del> <b>0.10</b>	-	-	-	-	-	-
Raw Material Storage Silos	1.28	1.28	1.28	-	-	-	-	-	-
Insignificant Combustion	0.08	<del>0.08</del> <b>0.33</b>	<del>0.08</del> <b>0.33</b>	0.03	<del>4.38</del> <b>4.29</b>	0.24	<del>3.68</del> <b>3.61</b>	0.08	0.08 Hexane
Total PTE of Entire Source	<del>132.18</del> <b>161.25</b>	<del>42.76</del> <b>46.40</b>	<del>42.76</del> <b>46.40</b>	0.03	<del>4.38</del> <b>4.29</b>	≤90.24	<del>3.68</del> <b>3.61</b>	≤24.08	≤9.00
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 (1) PM10 and PM2.5 emissions for the batch mixers, conveyors, and material loading are limited by 326 IAC 6-3 and 3216 IAC 2-8-4 (FESOP). Unlimited PTE calculations are in an IDEM, OAQ confidential file. Baghouses BH3 and either BH2 or BH9 are required to operate for control.  
 (2) Pursuant to 326 IAC 2-8-4 (FESOP), ingredient materials used by the ~~four~~ **five (45)** mixing operations shall be limited such that emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year. These are existing requirements.

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM <sub>10</sub> * <sup>(1)</sup>	PM <sub>2.5</sub> ** <sup>(1)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Mixer #1 (Mixing Process 1) (BH2/BH9)	95.44	14.49	14.49	-	-	90.0 <sup>(2)</sup>	-	24.0 <sup>(2)</sup>	9.00 <sup>(2)</sup>	
Mixer #2 (Mixing Process 2) (BH2/BH9)				-	-		-			
Mixer #3 (Mixing Process 3) (BH2/BH9)				-	-		-			
HB Mixer-4 (Mixing Process 4) (BH2/BH9)				-	-		-			
LSR Mixer #1 (Compounding Operation) (BH3)	45.77	11.62	11.62	-	-		-			-
LSR Mixer #2 (Compounding Operation) (BH3)				-	-		-			
LSR Mixer #3 (Compounding Operation) (BH3)				-	-		-			
LSR Mixer #4 (Compounding Operation) (BH3)				-	-		-			
Mixer #4 (Compounding Operation) (BH5)	5.33	5.33	5.33	-	-		-			-
Mixer #6 (Compounding Operation) (BH5)				-	-		-			
Mixer #11 (Compounding Operation) (BH5)				-	-		-			
Mixer #10 (Compounding Operation) (BH7)	6.57	6.57	6.57	-	-		-			-
Mixer #8 (Compounding Operation) (BH8)	6.57	6.57	6.57	-	-	-	-			
Untreated Fume Silica Storage Silo (Integral Bin Filter)	0.10	0.10	0.10	-	-	-	-	-		
Treated Fume Silica Storage Silo (Integral Bin Filter)	0.10	0.10	0.10	-	-	-	-	-		
Raw Material Storage Silos	1.28	1.28	1.28	-	-	-	-	-		
Insignificant Combustion	0.08	0.33	0.33	0.03	4.29	0.24	3.61	0.08 Hexane		
<b>Total PTE of Entire Source</b>	<b>161.25</b>	<b>46.40</b>	<b>46.40</b>	<b>0.03</b>	<b>4.29</b>	<b>90.24</b>	<b>3.61</b>	<b>24.08</b>	<b>9.00</b>	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA	

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 (1) PM10 and PM2.5 emissions for the batch mixers, conveyors, and material loading are limited by 326 IAC 6-3 and 3216 IAC 2-8-4 (FESOP). Unlimited PTE calculations are in an IDEM, OAQ confidential file. Baghouses BH3 and either BH2 or BH9 are required to operate for control.  
 (2) Pursuant to 326 IAC 2-8-4 (FESOP), ingredient materials used by the five (5) mixing operations shall be limited such that emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year. These are existing requirements.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

Criteria Pollutants

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

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

Unit ID / Description	Control Description	Limited PM10 (lbs/hr)	Limited PM2.5 (lbs/hr)
Mixer #1 (Mixing Process 1)	BH2 or BH9	3.31	3.31
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
HB Mixer-4 (Mixing Process 4)			
LSR Mixer #1 (Compounding Operation)	BH3	2.65	2.65
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

Due to this modification the PM10 and PM2.5 limits for the four (4) mixing processes controlled by either baghouses BH2 or BH9 have been increased from 2.62 pounds per hour to 3.31 pounds per hour. The PM10 and PM2.5 limits for the LSR mixers did not require any changes in this revision.

- (2) The total VOC generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of VOC shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This limit has been revised to include the new mixing process. The source-wide VOC emission limit of 90 tons per twelve (12) consecutive month period was not modify due to this revision.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

HAPs

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

- (1) The individual HAP generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (2) The total HAP generating material input to the five (5) mixing operations (identified as mixing processes 1, 2, 3, and 4 and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These limits have been revised to include the new mixing process. This revision did not require any decreases or increase to the individual HAP and total HAP input limits.

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

- (b) PSD Minor Source – PM  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

<b>Federal Rule Applicability Determination</b>
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- (a) New Source Performance Standards (NSPS)
  - (1) The requirements of NSPS for Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry (40 CFR Part 60, Subpart DDD) (326 IAC12) are not included in this revision because this source does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) as defined in 40 CFR 60.561.
  - (2) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
  - (1) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins (40 CFR Part 63, Subpart U) (326 IAC 20-19) are not included in this revision because the source does not manufacture an elastomer product as defined in 40 CFR 63.482.
  - (2) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Generic Maximum Achievable Control Technology Standards (40 CFR Part 63, Subpart YY) (326 IAC 20-44) are not included in this revision because this source is not one of the source categories specified in 40 CFR 63.1103(a) through (h). The source does not manufacture an acetal resins product as defined in 40 CFR 63.1103(a).
  - (3) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ) (326 IAC 20-21) are not included in this revision because this source does not manufacture a thermoplastic product as defined in 40 CFR 63.1312.
  - (4) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

(c) Compliance Assurance Monitoring (CAM)

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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(a) 326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The unlimited potential to emit of HAPs from the entire source is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall continue to limit the potential to emit HAPs from the entire source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(d) 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.

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

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

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

(2) Opacity shall not exceed 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.

(f) 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.

- (g) 326 IAC 12 (New Source Performance Standards)  
 See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
 See Federal Rule Applicability Section of this TSD.

Mixing Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-2(e), the particulate (PM) from the silicone elastomer production facilities listed in the table below shall be limited by the following:

	Unit ID / Description	Control	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	BH2/BH9	0.726	3.31
	Mixer #2 (Mixing Process 2)			
	Mixer #3 (Mixing Process 3)			
	HB Mixer-4 (Mixing Process 4)			
Compounding Line	Mixer #4 (Compounding Operation)	BH5	0.436	2.35
	Mixer #6 (Compounding Operation)			
	Mixer #11 (Compounding Operation)			

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

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

To comply with these limits, either of the two (2) baghouses identified as BH2 and BH9 for particulate control shall be in operation and control emissions at all times when solid material is being added to a mixing tank or when solid material is being blended into a mixing tank. The Permittee shall operate the control devices BH2 and BH9 in accordance with manufacturer's specifications.

Based on the calculations in Appendix A, baghouse BH5 is not needed to comply with the limit for Mixers #4, #6, and #11.

- (2) The untreated and treated fume silica storage silos each have a potential to emit less than 0.551 pounds per hour after the integral pneumatic bin filter systems. Therefore, pursuant to 326 IAC 6-3-1(b)(14), each storage silo is not subject to the requirements of 326 IAC 6-3-2.

This is a change in rule applicability due to this revision.

- (3) The raw material storage silos have a potential to emit less than 0.551 pounds per hour before controls. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the raw material storage silos are not subject to the requirements of 326 IAC 6-3-2.

This is a change in rule applicability due to this revision.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited VOC potential emissions from the new mixing process #4 is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from mixing process #4 to less than twenty-five (25) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, mixing process #4 shall be limited as follows:

- (1) The total VOC generating material input to the one (1) mixing operation (identified as mixing process 4), including their associated clean-up activities, shall be limited such that the VOC emissions from the one (1) mixing operation shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the mixing operation to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### Degreasing Operations

- (a) 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)  
This source currently has two (2) degreasing operations, which are subject to 326 IAC 8-3-2. On January 30, 2013, 326 IAC 8-3-2 was revised. As a result, IDEM is reevaluating the applicability of 326 IAC 8-3-2 for the existing degreasers.

The two (2) degreasing operations, each meet the definition of a cold cleaner degreasing operation. Both operations were constructed after July 1, 1990 and are not equipped with remote solvent reservoirs. Therefore, these operations are subject to the requirements of 326 IAC 8-3-2.

Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall 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.

Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall 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; an
    - (B) shall be applied at a pressure that does not cause excessive splashing.
- (b) 326 IAC 8-3-5 (Cold cleaner degreaser operation and control)  
The existing degreasing operations are currently subject to 326 IAC 8-3-5. However, on January 30, 2013, this rule was repealed. Therefore, the degreasing operations are no longer subject to this rule and the requirements of this rule will be removed from the permit.
- (c) 326 IAC 8-3-8 (Material Requirements for cold cleaner degreasers)  
326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufacturers solvent for use in cold cleaner degreasers before January 1, 2015, in Clark, Floyd, Lake or Porter Counties or on and after January 1, 2015, anywhere in the state. This source is located in a DeKalb County and uses solvent in cold cleaner degreasers. Therefore, effective January 1, 2015, the degreasing operations are subject to the requirements of 326 IAC 8-3-8.
- (a) Material requirements are as follows:
    - (1) No person shall operate a cold cleaner 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) Record keeping requirements are as follows:
    - (1) All persons subject to the requirements of subsection (a)(1) shall maintain each of the following records for each purchase:
      - (A) The name and address of the solvent supplier.
      - (B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
      - (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).
- (c) All records required by subsection (b) shall be:
- (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
  - (2) reasonably accessible for an additional two (2) year period.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) The compliance monitoring requirements applicable to this proposed revision are as follows:

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>
mixer (HB Mixer-4)/ Baghouses BH2 or BH9	Pressure Drop	Once per day
	Visible Emissions	Once per day

These monitoring conditions are necessary because the baghouses for the mixing process must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

These are existing compliance monitoring requirements for the baghouses BH2 and BH9, which also control the emissions from mixing processes 1, 2, and 3.

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

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

The PM emissions for these units were calculated using AP-42 emission factors and mass balance data submitted by the Permittee. IDEM considers these emission factors reliable. Therefore testing is not required.

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

### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Sections A.2 and D.1 have been revised to include new descriptive information for the new and modified emission units. In addition, the descriptive information for Mixer #9 has been removed from these sections.
- (2) Condition D.1.1 has been revised to include the new mixing process #4. In addition, the wording of the limit has been revised to ensure that each mixing process does not emit equal to or greater than 25 tons of VOC per year. As currently worded this limit would allow the source to emit 25 tons of VOC from each process. If any of the processes emits equal to or greater than 25 tons of VOC per year that process would be subject to the requirements of 326 IAC 8-1-6 and the source would be required to reduce VOC emissions using Best Available Control Technology (BACT). The FESOP Quarterly Reports have also been revised to reflect these changes.
- (3) Condition D.1.2 has been revised to include the new mixing process and revised PM10 and PM2.5 limits for baghouse BH2 or BH9.
- (4) Condition D.1.3 has been revised to include the new mixing process, reflect the relocation of mixer #11, and removal of mixer #9.
- (5) Condition D.1.5 has been revised to include applicable requirements for multi-compartment baghouses.
- (6) Conditions D.1.6, D.1.7, D.1.10, D.1.11, and the relevant FESOP Quarterly Reports have been revised to include the new mixing process.
- (7) A new Condition D.1.9 has been included which contains the applicable requirements for single compartment baghouses.

...  
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:

One (1) polydimethylsiloxane mixing operation consisting of:

- ...
- (f) **One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:**
    - (1) **One (1) 2,200 pound raw material storage silo, with no control;**
    - (2) **One (1) pneumatic conveyor system; and**
    - (3) **One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building.**
  - (fg) One (1) batch mixing operation, identified as Compounding, **approved in 2016 for modification**, including ~~ten (10)~~ **nine (9)** mixing processes consisting of:
    - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, ~~modified in 2015 to install baghouse BH9~~ **and approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5**, with particulate emissions controlled by ~~either of two (2) baghouses identified as~~

~~BH2 and BH9, exhausting outside the building~~ **a baghouse identified as BH5, exhausting inside the building.**

- (2) ~~Three~~ **Two (32)** mixers, identified as Mixer #4, ~~Mixer #9~~, and Mixer #6 with nominal mixer volumes of 10, ~~25~~ and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; ~~Mixer #4, Mixer #9, and Mixer #6~~ were constructed prior to 2002.

...  
SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) polydimethylsiloxane mixing operation consisting of:

- ...  
(e) **One (1) mixing process, identified as Mixing Process #4, approved in 2016 for construction, consisting of:**
- (1) **One (1) 2,200 pound raw material storage silo, with no control;**
  - (2) **One (1) pneumatic conveyor system; and**
  - (3) **One (1) mixer, identified as HB Mixer-4, with a nominal mixer volume of 500 gallons, with particulate emissions controlled by either of two (2) baghouses identified as BH2 and BH9, exhausting emissions outside the building.**
- (f) One (1) batch mixing operation, identified as Compounding, **approved in 2016 for modification**, including ~~ten~~ **nine (409)** mixing processes consisting of:
- (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, ~~modified in 2015 to install baghouse BH9 and~~ **approved in 2016 for modification to relocate the mixer and exhaust to baghouse BH5**, with particulate emissions controlled by ~~either of two (2) baghouses identified as BH2 and BH9, exhausting outside the building~~ **a baghouse identified as BH5, exhausting inside the building.**
  - (2) ~~Three~~ **Two (32)** mixers, identified as Mixer #4, ~~Mixer #9~~, and Mixer #6 with nominal mixer volumes of 10, ~~25~~ and 50 gallons respectively, with particulate emissions for these mixers controlled by a baghouse identified as BH5, exhausting inside the building; ~~Mixer #4, Mixer #9, and Mixer #6~~ were constructed prior to 2002.
- ...

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

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

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3~~, **and 4** and the Compounding Operation), including their associated clean-up activities, shall be limited such that the VOC emissions from each of the ~~four~~ **five (45)** mixing operations shall ~~not exceed~~ **be limited to less than 25.0** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

- (a) The individual HAP generating material input to the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total HAP generating material input to the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total VOC generating material input to the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation), including their associated clean-up activities, shall be limited such that the combined emissions of VOC shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The allowable PM10 and PM2.5 emission rate from each mixing process **after control** shall be limited as follows:

Unit ID / Description	Control Description	Limited PM10 (lbs/hr)	Limited PM2.5 (lbs/hr)
Mixer #1 (Mixing Process 1)	BH2 or BH9	<del>2.62</del> <b>3.31</b>	<del>2.62</del> <b>3.31</b>
Mixer #2 (Mixing Process 2)			
Mixer #3 (Mixing Process 3)			
<del>Mixer #11 (Compounding Operation)</del>			
<b>HB Mixer-4 (Mixing Process 4)</b>	BH3	2.65	2.65
LSR Mixer #1 (Compounding Operation)			
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			

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

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

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

Unit ID / Description	Control	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)
Mixer #1 (Mixing Process 1)	BH2 or BH9	<del>0.514</del> <b>0.726</b>	<del>2.62</del> <b>3.31</b>
Mixer #2 (Mixing Process 2)			

Mixer #3 (Mixing Process 3)			
<del>Mixer #11 (Compounding Operation)</del>			
<b>HB Mixer-4 (Mixing Process 4)</b>			
LSR Mixer #1 (Compounding Operation)	BH3	0.523	2.65
LSR Mixer #2 (Compounding Operation)			
LSR Mixer #3 (Compounding Operation)			
LSR Mixer #4 (Compounding Operation)			
Mixer #4 (Compounding Operation)	BH5	<del>0.568</del> <b>0.436</b>	<del>2.81</del> <b>2.35</b>
Mixer #6 (Compounding Operation)			
<del>Mixer #9 (Compounding Operation)</del>			
<b>Mixer #11 (Compounding Operation)</b>			
Mixer #10 (Compounding Operation)	BH7	0.750	3.38
Mixer #8 (Compounding Operation)	BH8	0.750	3.38
<del>Untreated Fume Silica Storage Silo</del>	<del>Integral Bin Filter</del>	<del>0.750</del>	<del>3.38</del>
<del>Treated Fume Silica Storage Silo</del>	<del>Integral Bin Filter</del>	<del>0.750</del>	<del>3.38</del>
<del>Raw Material Storage Silos</del>	<del>NA</del>	<del>1.467</del>	<del>5.30</del>

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

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

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

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

A Preventive Maintenance Plan is required for **the** mixing processes and the control devices identified as BH2, BH3, and BH9. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

#### Compliance Determination Requirements [326 IAC 2-8-4(1)]

##### D.1.5 Particulate Control

...

- (c) **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 notification 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.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination

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

...

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, ~~and 3~~, **and 4** and the Compounding Operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

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

D.1.7 Visible Emissions Notations

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- (a) Daily visible emission notations of the baghouses identified as BH2, ~~BH3~~, and BH9 shall be performed during normal daylight operations when the **associated** mixing processes 1, 2, ~~and 3~~, **and 4** and the ~~Compounding Operation~~ are in operation and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

D.1.8 Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across the baghouses (identified as BH2, BH3, and BH9) used in conjunction with the mixing processes, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. **The normal range for these units 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 or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

...

D.1.9 Broken or Failed Bag Detection

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- (a) **For a single compartment baghouses 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)] [326 IAC 2-8-16]

D.1.910 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (1) The total weight of each VOC generating material used at each mixing process 1, 2, ~~and 3~~, **and 4** and the Compounding Operation each calendar month; and

emissions of VOC each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used except as provided in paragraph (2) below.

- (2) The total VOC generating material input and the emissions of VOC for each compliance period. If the combined emissions of VOC in the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation).
- (3) The total weight of each HAP generating material used by mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation each calendar month; and emissions of individual and total HAPs each calendar month, as determined utilizing the equation specified in Condition D.1.6.

...  
**D.1.101 Reporting Requirements**

---

- ...
- (b) If the combined VOC emissions from the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation) including associated clean-up activities, are less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Conditions D.1.1 and D.1.2(c) using a combined total for the ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation).
- ...

FESOP Quarterly Report

...  
Facility: Mixing process 1  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the emissions of VOC shall ~~not exceed~~ **be limited to less than 25.0** tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...  
FESOP Quarterly Report

...  
Facility: Mixing process 2  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the emissions of VOC shall ~~not exceed~~ **be limited to less than 25.0** tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...  
FESOP Quarterly Report

...  
Facility: Mixing process 3  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the emissions of VOC shall ~~not exceed~~ **be limited to less than 25.0** tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

**Source Name:** Momentive Performance Materials USA, LLC  
**Source Address:** 420 North Taylor Road, Garrett, Indiana 46738  
**FESOP Permit No.:** F033-31439-00075  
**Facility:** Mixing Process 4  
**Parameter:** Total VOC emissions  
**Limit:** The total VOC generating material input to the Mixing process 4, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

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

...

FESOP Quarterly Report

...

**Facility:** Compounding Operation  
**Parameter:** Total VOC emissions  
**Limit:** The total VOC generating material input to the Compounding Operation, including associated clean-up activities, shall be limited such that the emissions of VOC shall ~~not exceed~~ **be limited to less than 25.0** tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report

...  
Facility: The ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~  
**and 4** and the Compounding Operation)  
Parameter: Total VOC emissions  
Limit: The total VOC generating material input to the mixing operations (identified as  
mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation), including  
their associated clean-up activities, shall be limited such that the emissions of  
shall not exceed 90 tons per twelve (12) consecutive month period with  
compliance determined at the end of each month.

...  
FESOP Quarterly Report

...  
Facility: The ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~  
**and 4** and the Compounding Operation)  
Parameter: Total HAP emissions  
Limit: The total HAP emissions from the mixing operations (identified as mixing  
processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation), including their  
associated clean-up activities, shall be limited such that the combined emissions  
of total HAP shall not exceed 24 tons per twelve (12) consecutive month period  
with compliance determined at the end of each month.

...  
FESOP Quarterly Report

...  
Facility: The ~~four~~ **five (45)** mixing operations (identified as mixing processes 1, 2, ~~and 3,~~  
**and 4** and the Compounding Operation)  
Parameter: The individual HAP emissions  
Limit: The individual HAP emissions from the ~~four~~ **five (45)** mixing operations (identified  
as mixing processes 1, 2, ~~and 3,~~ **and 4** and the Compounding Operation),  
including their associated clean-up activities, shall be limited such that the  
combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12)  
consecutive month period with compliance determined at the end of each month.

...  
**Additional Changes**

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) Sections A.3 and D.2 have been revised to reflect the current requirements applicable to the degreasing operations.
- (2) IDEM added the rule citation 326 IAC 2-8-4(1) to the Compliance Determination Requirements subsection title in Section D. 1 to clarify the authority of these conditions.
- (3) IDEM has removed the requirement to perform visible emission notation in Condition D.1.7 for baghouse BH3, which controls emissions from the LSR Mixers because this baghouse does not exhaust to the outdoors (see above for bold and strikethrough).
- (4) IDEM has decided to clarify Condition D.1.8 - Parametric Monitoring.
- (5) Section D.2 has been revised to include the most current applicable requirements of 326 IAC 8-3-2, remove the requirements of 326 IAC 8-3-5, and include the newly applicable requirements of 326 IAC 8-3-8.

- (6) 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule. In addition, the existing rule citation is being corrected to refer to the FESOP rules.

...

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-58].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-58].

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-58].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-58].

...

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

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

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

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

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

- ~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:~~

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

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

---

- (a) Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements, the owner or operator of a cold cleaner degreaser shall ensure that 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 cover whenever articles are not being handled in the degreaser.**
  - (4) Drain cleaned articles 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 could allow greater than twenty percent (20%) of the waste solvent by weight to evaporate.
- (b) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall 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 that 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), 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.2.3 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.2, 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.

  - (1) The name and address of the solvent supplier.

- (2) **The date of purchase (or invoice/bill dates of contract servicer indicating service date).**
  - (3) **The type of solvent purchased.**
  - (4) **The total volume of the solvent purchased.**
  - (5) **The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).**
- (b) **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

...

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT

...

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC **2-8-12. 2-7-16**

...

<b>Conclusion and Recommendation</b>
--------------------------------------

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 August 2, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 033-37468-00075. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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: Emission Calculations  
Modification Summary**

**Source Name: Momentive Performance Materials USA, LLC**  
**Source Address: 420 North Taylor Road, Garrett, IN 46738**  
**Permit Number: F033-37468-00075**  
**Plant ID: 033-00075**  
**Permit Writer: Brian Williams**

<b>Potential to Emit of Modification (tons/yr)</b>										
<b>Emission Unit</b>	<b>Control ID</b>	<b>PM*</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Single HAP</b>	<b>Combined HAPs</b>
HB Mixer-4 (Mixing Process 4)	BH2 or BH9	30.40	30.40	30.40	-	-	62.68	-	-	-
<b>Total</b>		<b>30.40</b>	<b>30.40</b>	<b>30.40</b>	<b>-</b>	<b>-</b>	<b>62.68</b>	<b>-</b>	<b>-</b>	<b>-</b>

**Appendix A: Emission Calculations  
Emissions Summary**

**Source Name: Momenive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, IN 46738  
Permit Number: F033-37468-00075  
Plant ID: 033-00075  
Permit Writer: Brian Williams**

Emission Unit	Control ID	Limited Potential to Emit (tons/yr)								
		PM*	PM10**	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Combined HAPs
Mixer #1 (Mixing Process 1)	BH2 or BH9	95.44	14.49	14.49	-	-	90.00	-	9.00	24.00
Mixer #2 (Mixing Process 2)					-	-		-		
Mixer #3 (Mixing Process 3)					-	-		-		
HB Mixer-4 (Mixing Process 4)					-	-		-		
LSR Mixer #1 (Compounding Operation)	BH3	45.77	11.62	11.62	-	-	90.00	-	9.00	24.00
LSR Mixer #2 (Compounding Operation)					-	-		-		
LSR Mixer #3 (Compounding Operation)					-	-		-		
LSR Mixer #4 (Compounding Operation)					-	-		-		
Mixer #4 (Compounding Operation)	BH5	5.33	5.33	5.33	-	-	90.00	-	9.00	24.00
Mixer #6 (Compounding Operation)					-	-		-		
Mixer #11 (Compounding Operation)					-	-		-		
Mixer #10 (Compounding Operation)	BH7	6.57	6.57	6.57	-	-	90.00	-	9.00	24.00
Mixer #8 (Compounding Operation)	BH8	6.57	6.57	6.57	-	-		-		
Untreated Fume Silica Storage Silo	Bin Filter <sup>(1)</sup>	0.10	0.10	0.10	-	-		-		
Treated Fume Silica Storage Silo	Bin Filter <sup>(2)</sup>	0.10	0.10	0.10	-	-	-	-	-	-
Raw Material Storage Silos (Mixing Process 1, 2, 3, & 4)	NA	1.28	1.28	1.28	-	-	-	-	-	-
Insignificant Combustion	NA	0.08	0.33	0.33	0.03	4.29	0.24	3.61	0.08	0.08
<b>Total</b>		<b>161.25</b>	<b>46.40</b>	<b>46.40</b>	<b>0.03</b>	<b>4.29</b>	<b>90.24</b>	<b>3.61</b>	<b>9.00</b>	<b>24.08</b>

**Notes:**

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

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

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

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

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

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

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

**Source Name: Momenive Performance Materials USA, LLC**  
**Source Address: 420 North Taylor Road, Garrett, IN 46738**  
**Permit Number: F033-37468-00075**  
**Plant ID: 033-00075**  
**Permit Writer: Brian Williams**

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

Unit ID / Description	Control	Unlimited PTE			Allowable PM Emissions (326 IAC 6-3-2)		FESOP Limited PM <sub>10</sub> , PM <sub>2.5</sub> **		Control Needed to Comply?	Controlled PM <sub>10</sub> , PM <sub>2.5</sub>				
		PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (lb/hr)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (lb/hr) by Control	PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions (tons/yr) by Control	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)		(lbs/hr)	(tons/yr)			
Hot Base Mixers	Mixer #1 (Mixing Process 1)	5.55	21.79	95.44	3.309	14.49	3.31	14.49	YES	0.22	0.95			
	Mixer #2 (Mixing Process 2)	5.55												
	Mixer #3 (Mixing Process 3)	3.75												
	HB Mixer-4 (Mixing Process 4)	6.94												
Compounding Operation	LSR Mixer #1	8.00	10.45	45.77	2.654	11.62	2.65	11.62	YES	0.10	0.46			
	LSR Mixer #2	1.13												
	LSR Mixer #3	0.20												
	LSR Mixer #4	1.13												
	Mixer #4	0.14	1.22	5.33	2.35	10.30	N/A	N/A	N/A	0.01	0.05			
	Mixer #6	0.70												
	Mixer #11	0.38												
	Mixer #10	1.50												
Silos - Material Loading	Mixer #8	1.50	1.50	6.57	3.38	14.81	N/A	N/A	N/A	0.02	0.07			
	Untreated Fume Silica Storage Silo <sup>(1)</sup>	Integral Bin Filter	0.02	0.02	0.10	N/A						N/A	0.02	0.10
	Treated Fume Silica Storage Silo <sup>(1)</sup>	Integral Bin Filter	0.02	0.02	0.10	N/A						N/A	0.02	0.10
	Raw Material Storage Silos	NA	0.29	0.29	1.28	N/A						N/A	0.07	0.32
		<b>Totals:</b>			<b>161.16</b>		<b>45.11</b>			<b>2.12</b>				

**Notes:**

Limits are specified by the control common to specific emissions units or processes.  
 Unlimited mixer emissions based on tested emission factor for process and batch size (lb/lb), cycle time, and maximum number of batches per day, which are considered confidential information.  
 Mixers have baghouse as control with 99% control efficiency  
 \*\*Limited PM10 and PM2.5 Potentials based on 326 IAC 6-3-2 allowable emission rates for Control BH2 and Control BH3.  
 (1) Treated and Untreated Fume Silica Storage Silos have controls integral to the process; PTE and rule applicability determined after control. PTE before control is 2.25 lbs/hr, each or 9.86 tons per year, each.  
 Raw Material Silos emission factor for large silos is 3.0 lb/ton based on AP-42 11.13, Table 11.13-2 (SCC 3-05-012-21)(Unloading and Conveying)  
 Raw Material Small Silos emission factor is 0.2 lb/ton based on AP-42 11.13, Table 11.13-2 (SCC 3-05-012-22)(Storage Bins)  
 Storage silos exempt from 326 IAC 6-3-2 pursuant to 326 IAC 6-3-1(b)(14) because PM emissions are less than 0.551 lbs/hr, each.

**VOC Potential to Emit**

Unit ID / Description	Unlimited PTE				326 IAC 8-1-6 BACT Avoidance VOC Limit	FESOP & PSD Minor VOC Limit
	VOC emissions (lb/hr)	VOC emissions (tons/yr)	VOC emissions (lb/hr)	VOC emissions (tons/yr)	VOC emissions (tons/yr)	VOC emissions (tons/yr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	14.31	62.68	14.31	62.68	<25.00
	Mixer #2 (Mixing Process 2)	14.31	62.68	14.31	62.68	<25.00
	Mixer #3 (Mixing Process 3)	8.59	37.62	8.59	37.62	<25.00
	HB Mixer #4	14.31	62.68	14.31	62.68	<25.00
Compounding Operation	LSR Mixer #1	14.31	62.68	42.80	187.46	<25.00
	LSR Mixer #2	1.43	6.26			
	LSR Mixer #3	0.29	1.27			
	LSR Mixer #4	1.43	6.26			
	Mixer #4	0.29	1.27			
	Mixer #6	1.43	6.26			
	Mixer #11	0.72	3.15			
	Mixer #10	14.31	62.68			
Mixer #8	8.59	37.62				
<b>Total:</b>		<b>94.32</b>	<b>413.12</b>	<b>94.32</b>	<b>413.12</b>	

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

**Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, IN 46738  
Permit Number: F033-37468-00075  
Plant ID: 033-00075  
Permit Writer: Brian Williams**

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

	Unit ID / Description	Control	Process Weight Rate (lbs/hour)	Process Weight Rate (tons/hour)	Allowable Rate of Emissions (lb/hr)	Allowable Rate of Emissions (tons/yr)
Hot Base Mixers	Mixer #1 (Mixing Process 1)	BH2 or BH9	1,452.5	0.726	3.31	14.49
	Mixer #2 (Mixing Process 2)					
	Mixer #3 (Mixing Process 3)					
	HB Mixer-4 (Mixing Process 4)					
Compounding Operation	LSR Mixer #1	BH3	1,045.0	0.523	2.65	11.62
	LSR Mixer #2					
	LSR Mixer #3					
	LSR Mixer #4					
	Mixer #4	BH5	872.5	0.436	2.35	10.30
	Mixer #6					
	Mixer #11					
	Mixer #10	BH7	1,500.0	0.750	3.38	14.81
Mixer #8	BH8	1,500.0	0.750	3.38	14.81	
Silos - Material Loading	Untreated Fume Silica Storage Silo*	Integral Bin Filter	N/A	N/A	N/A	N/A
	Treated Fume Silica Storage Silo*	Integral Bin Filter	N/A	N/A	N/A	N/A
	Raw Material Storage Silos*	NA	N/A	N/A	N/A	N/A

**66.04**

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

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

\*Exempt pursuant to 326 IAC 6-3-1(b)(14) because PM emissions are less than 0.551 lbs/hr, each.

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

**Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, IN 46738  
Permit Number: F033-37468-00075  
Plant ID: 033-00075  
Permit Writer: Brian Williams**

Unit ID / Description	Control Description	Limited PM10, PM2.5		
		(lbs/hr)	(tons/yr)	
Mixer #1 (Mixing Process 1)	BH2 or BH9	3.31	14.49	
Mixer #2 (Mixing Process 2)				
Mixer #3 (Mixing Process 3)				
HB Mixer-4 (Mixing Process 4)				
LSR Mixer #1 (Compounding Operation)	BH3	2.65	11.62	
LSR Mixer #2 (Compounding Operation)				
LSR Mixer #3 (Compounding Operation)				
LSR Mixer #4 (Compounding Operation)				
Mixer #4 (Compounding Operation)	BH5	4.56	19.95	<i>Unlimited</i>
Mixer #6 (Compounding Operation)				
Mixer #9 (Compounding Operation)				
Mixer #11 (Compounding Operation)				
Mixer #10 (Compounding Operation)				
Mixer #8 (Compounding Operation)				
Untreated Fume Silica Storage Silo	Integral Bin Filter			
Treated Fume Silica Storage Silo	Integral Bin Filter			
Raw Material Storage Silos	N/A			
		<b>46.07</b>		

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

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

**Source Name: Momentive Performance Materials USA, LLC  
Source Address: 420 North Taylor Road, Garrett, IN 46738  
Permit Number: F033-37468-00075  
Plant ID: 033-00075  
Permit Writer: Brian Williams**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.0	1020	85.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.08	0.33	0.33	0.03	4.29	0.24	3.61

\*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

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.0E-05	5.2E-05	3.2E-03	0.08	1.5E-04	<b>0.08</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.1E-05	4.7E-05	6.0E-05	1.6E-05	9.0E-05	<b>2.4E-04</b>
					<b>Total HAPs</b>	<b>0.08</b>
					<b>Worst HAP</b>	<b>0.08</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.



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**September 21, 2016**  
**Momentive Performance Materials USA, LLC**  
**033-37468-00075**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

September 21, 2016

Mr. James D. Bilimek  
Momentive Performance Materials USA, LLC  
420 N Taylor Road  
Garrett, IN 46738

Re: Public Notice  
Momentive Performance Materials USA, LLC  
Permit Level: Significant Permit Revision  
Permit Number: 033-37468-00075

Dear Mr. Bilimek:

Enclosed is a copy of your draft Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Auburn Evening Star in Auburn, Indiana publish the abbreviated version of the public notice no later than September 26, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Garrett Public Library, 107 West Houston Street in Garrett, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Williams, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5375 or dial (317) 234-5375.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

September 21, 2016

To: Garrett Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Momentive Performance Materials USA, LLC**  
**Permit Number: 033-37468-00075**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/16/2016



# 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*

**Carol S. Comer**  
*Commissioner*

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

September 21, 2016

Auburn Evening Star  
118 West Ninth Street  
Auburn, IN 46706

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Momentive Performance Materials USA, LLC, DeKalb County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than September 26, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permit Branch  
Office of Air Quality

Permit Level: Significant Permit Revision  
Permit Number: 033-37468-00075

Enclosure

PN Newspaper.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	GHOTOPP 9/21/2016 Momentive Performance Materials USA LLC 033-37468-00075 Draft		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>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		James D Bilimek Momentive Performance Materials USA LLC 420 N Taylor Rd Garrett IN 46738 (Source CAATS)										
2		Lynda Nguyen Plant Manager Momentive Performance Materials USA LLC 420 N Taylor Rd Garrett IN 46738 (RO CAATS)										
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
6		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Garrett Public Library 107 W Houston Garrett IN 46738-1494 (Library)										
9		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
10		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
11		Garrett City Council and Mayors Office P.O. Box 332, 130 S Randolph Garrett IN 46738 (Local Official)										
12		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)										
13		Kim Earl Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)										
14												
15												

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