

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Foamex, L.P.
603 Industrial Parkway
Elkhart, Indiana 45616**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7431-00302	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

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

The Permittee owns and operates one (1) stationary flexible polyurethane foam manufacturing plant.

Responsible Official: Jerry Gill, Plant Manager
Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
SIC Code: 3086
County Location: Elkhart
County Status: Attainment for all criteria pollutants.
Source Status: Part 70 Permit Program
Minor Source, PSD Rules
Major Source, Section 112 of the Clean Air Act

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

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

one (1) polyurethane foam production pourline which commenced operation in 1982, with a maximum capacity to produce 320,000 board feet per hour of polyurethane foam, consisting of the following equipment:

- (1) one (1) mixing pourline foam machine which exhausts into Stacks 1 thru 8 (S/V ID 1,2,3,4,5,6,7,8), and;
- (2) one (1) curing/storage room which exhausts into Stacks 9 thru 11 (S/V ID 9,10,11).

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

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

- (1) Natural gas-fired heaters combustion sources with heat input less than ten million (10,000,000) Btu per hour.

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

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits and exemptions issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from December 1 to November 30 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(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, OAM, 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 Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

- (A) A description of the emergency;
 - (B) Any steps taken to mitigate the emissions; and
 - (C) Corrective actions taken.
- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:
- (1) The applicable requirements are included and specifically identified in this permit;

- (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.
- (b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

(B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, 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 in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).

(b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).

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

B.20 Minor Permit Modification [326 IAC 2-7-12]

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.

- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.24 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(c) Emission Trades [326 IAC 2-7-20(c)]

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

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

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

B.25 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM,, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.29 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of VOC are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) is not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

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

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

C.8 Performance Testing [326 IAC 3-2.1]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Will continue to comply with such requirements that become effective during the term of this permit.
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Has certified that all facilities at this source are in compliance with all applicable requirements;

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
 - (3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

(c) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM shall supply such a plan.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
 - (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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, OAM on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit, the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) an emergency as defined in 326 IAC 2-7-1(12); or

- (3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

one (1) polyurethane foam production pourline which commenced operation in 1982, with a maximum capacity to produce 320,000 board feet per hour of polyurethane foam, consisting of the following equipment:

- (1) one (1) mixing pourline foam machine which exhausts into Stacks 1 through 8 (S/V ID 1,2,3,4,5,6,7,8), and;
- (2) one (1) curing/storage room which exhausts into Stacks 9 through 11 (S/V ID 9,10,11).

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2]

- (a) Total volatile organic compounds (VOC) emissions from the pourline facility shall be limited to no more than a fixed monthly limit of 2 tons of VOC per month. This limit consists of the following:
- (1) VOC usage in the blowing agent; and
 - (2) VOC emissions from all other unreacted raw material chemicals and intermediates used in the pourline which shall be calculated using emission factors based on May, 1990 stack testing performed on the pourline (see Appendix A, page 1 of 2 for detailed emissions calculations). When future stack testing is performed, the latest stack test results shall be used to calculate VOC emissions from the pourline.
- Compliance with this limit makes 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) not applicable. These limitations also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (b) Any change or modification to the pourline operation facility that results in an increase in facility VOC emissions to levels which exceed 25 tons per year, shall be subject to 326 IAC 8-1-6 (General Reduction Requirements).

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform VOC testing, to confirm the VOC emissions stated in D.1.1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. The Permittee shall conduct the performance test in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each raw material, blowing agent, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to raw materials and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the raw materials and blowing agent used for each month;
 - (4) The cleanup solvent usage for each or month;
 - (5) The total VOC usage for each day month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.1 the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

The following insignificant activities:

One (1) natural gas-fired boiler rated at 6.69 mmBtu per hour and installed in 1982.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 6.69 mmBtu per hour boiler shall be limited to 0.6 pounds PM per mmBtu heat input.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D..2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Foamex, L.P.
Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Part 70 Permit No.: T039-7431-00302

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:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Foamex, L.P.
Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Part 70 Permit No.: T039-7431-00302

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Foamex, L.P.
Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
Part 70 Permit No.: T039-7431-00302
Facility: Polyurethane Foam Pourline
Parameter: VOC usage and emissions
Limit: 2.0 tons per month VOC

YEAR:

Month	VOC Usage (tons) This Month
Month 1	
Month 2	
Month 3	

- 9 No deviation occurred in this quarter.
- 9 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 MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE REPORT**

Source Name: Foamex, L.P.
 Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
 Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
 Part 70 Permit No.: T039-7431-00302

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement	Number of Deviations	Date of each Deviations	No Deviations
Permit Condition D.1.1. Polyurethane Foam Machine Mixing Pourline shall limit VOC usage and emissions to 2 tons per month (24 tons per year).			

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

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Foamex, L.P.
Source Location: 603 Industrial Parkway, Elkhart, IN 46516
County: Elkhart
SIC Code: 3086
Operation Permit No.: T039-7431-00302
Permit Reviewer: Jeremy Magliaro / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Foamex, L.P., relating to the operation of a flexible polyurethane foam production plant.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units at the source at the time of this review.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

one (1) polyurethane foam production facility, commencing operation in 1982, with a maximum capacity of producing 320,000 board feet per hour of polyurethane foam, consisting of the following equipment:

- (1) one (1) mixing pourline foam machine which exhausts into Stacks 1 through 8 (S/V ID 1,2,3,4,5,6,7,8), and;
- (2) one (1) curing/storage room which exhausts into Stacks 9 through 11 (S/V ID 9,10,11).

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The application includes information relating to the construction and operation of a polyurethane foam production source consisting of the unpermitted emission units listed above. The above listed unpermitted emission units are reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired heaters combustion sources with heat input less than ten million (10,000,000) Btu per hour. (One (1) natural gas fired boiler rated at 6.69 mmBtu/hr)

- (2) The following VOC and HAP storage containers:
 - a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Cleaners and solvents characterized as follows:
 - a) having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 F) or;
 - b) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68 F); the used of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Closed loop heating and cooling systems.
- (7) Infrared cure equipment.
- (8) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (9) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (10) Heat exchanger cleaning and repair.
- (11) Process vessel degassing and cleaning to prepare for internal repairs.
- (12) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (15) Gasoline emergency generators not exceeding 110 horsepower.
- (16) Stationary fire pumps.
- (17) Purge double block and bleed valves.'
- (18) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

- (19) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (20) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - a) Four 6,500 gallon TDI (Toluene diisocyanate) Storage Tanks; and
 - b) One 6,500 gallon Methylene Chloride Storage Tank.
- (21) The following activities not previously identified with emissions equal to or less than insignificant thresholds;
 - a) One (1) 3,100 gallon Silicone Storage Tank;
 - b) Dye/Resin Storage Tanks;
 - c) Nine (9) 6,500 gallon Polyol Storage Tanks;
 - d) One (1) 6,565 gallon Fire Retardant Storage Tank;
 - e) Filler handling and storage system; and
 - f) Batch tank room.

Enforcement Issue

- (1) IDEM is aware that the unpermitted equipment listed in this document has been constructed and operated prior to receipt of the proper permit.
- (2) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996.

A notice of completeness letter was mailed to Foamex, L.P. on December 19, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (3 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene diisocyanate (TDI)	less than 10
Propylene oxide	greater than 10
Methylene chloride	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions:
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source testing. Information on actual source emissions were provided by the applicant and are based on 1995 actual operating hours of 728 hours per year, blowing agent usage rates, and 1990 stack testing emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	6.6
CO	0.0
HAP (Total)	324.0
NO _x	0.0

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

<i>Limited Potential to Emit (tons/year)</i>							
<i>Process/ facility</i>	<i>PM</i>	<i>PM-10</i>	<i>SO2</i>	<i>VOC</i>	<i>CO</i>	<i>NOX</i>	<i>HAPs</i>
pourline				24			1186
Total Emissions				24			1186

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (1) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

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

Federal Rule Applicability

- (1) The toluene diisocyanate (TDI) storage tanks (see Insignificant Activities) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60., Subpart Kb, (VOC Storage Tank Standard), because they were constructed in 1982. The VOC Storage Tank Standard (40 CFR 60 Subpart Kb) only applies to tanks constructed after July 23, 1984. Therefore, this standard does not apply.
- (2) There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source. A NESHAP for flexible polyurethane foam production facilities under the CAA 112(d) (40 CFR Part 63) is currently being considered for promulgation in December 1997. Foamex, L.P. will comply with the applicable NESHAP standards if and when finalized.
- (3) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 for halogenated solvent cleaners because Foamex does not operate halogenated solvent cleaning machines as defined by this rule. Methylene Chloride used for cleaning at the Foamex plant is used for wipe down purposes only.
- (4) The 6.69 mmBtu/hr natural gas boiler (see Insignificant Activities) is not subject to the New Source Performance Standard (NSPS) Subpart Dc because it has a maximum operating capacity less than 10 mmBtu/hr. The New Source Performance Standard (NSPS) Subpart Dc only applies to those boilers rated between 10 mmBtu/hr and 99 mmBtu/hr.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this polyurethane foam production source is not considered a major source because it has potential emissions less than 250 tons per year of any criteria pollutant. Therefore 326 IAC 2-2 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons of VOC per year in Elkhart county. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The polyurethane foam production source shall comply with the fugitive dust limitations outlined in 326 IAC 6-4 (Fugitive Dust Emissions). No fugitive dust emissions shall be visible crossing the boundary or property line of the source.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 {Maximum Achievable Control Technology (MACT)}

Effective July 27, 1997, any new or reconstructed major source of hazardous air pollutants (HAP) will be required to control emissions consistent with Maximum Achievable Control Technology (MACT). Pursuant to 326 IAC 2-1-3.4, sources for which there is no applicable National Emissions Standard for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 63, will be required to make the MACT determination on a case-by-case basis. This rule applies to new or reconstructed sources that are permitted after July 27, 1997. This polyurethane foam pourline facility was constructed in 1982, therefore 326 IAC 2-1-3.4 (Maximum Achievable Control Technology) does not apply.

326 IAC 6-2-3 [Emissions Limitations for Sources of Indirect Heating]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the natural gas-fired boiler rated 6.69 mmBtu/hr (see Insignificant Activity), constructed in 1982, shall be limited to 1.05 pounds of PM per million (mm) British thermal unit (Btu) heat input.

The limitation was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \quad \text{where:}$$

C = 50 micrograms per cubic meter;
Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu);
Q = Total source maximum operating capacity rating in million Btu per hour heat input.;
N = Number of stacks in the fuel burning operation;
a = Plume rise factor (the value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input);
h = stack height in feet.

Pursuant to 326 IAC 6-2-3(e), the particulate matter limit is truncated to 0.6 pounds per mmBtu heat input for indirect heating facilities which began operation after June 8, 1972. Therefore the PM emissions from the 6.69 mmBtu per hour natural gas-fired boiler are limited to 0.6 pounds per mmBtu.

The allowable PM10 emissions are equal to 17.58 tons per year based on the following calculation:

$$0.6 \text{ lb/mmBtu} \times 6.69 \text{ mmBtu/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lb} = 17.58 \text{ tons/year PM}$$

The potential PM emissions are equal to 0.35 tons per year (see Appendix A, page 3 of 3 for detailed emission calculations), therefore the 6.69 mmBtu per hr boiler is in compliance with 326 IAC 6-2-3 (Emissions Limitations for Sources of Indirect Heating).

326 IAC 8-1-6 (General Reduction Requirements)

326 IAC 8-1-6 (General Reduction Requirements) only applies to those facilities constructed after 1980 with a potential to emit greater than 25 tons per year VOC. The polyurethane foam pourline facility shall limit VOC emissions to 24 tons per year, therefore the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (General Reduction Requirements) do not apply. .

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The polyurethane foam production plant has applicable compliance monitoring conditions as specified below:

- a) A National Emissions Standard for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) for flexible polyurethane foam production facilities under the CAA 112(d) is currently being scheduled for promulgation in December 1997. Foamex, L.P. will comply with the applicable NESHAP standard for Most Achievable Control Technology (MACT) if and when the standard is released.
- b) The VOC usages in the pourline for polyurethane form production shall be limited to 24 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements) do not apply. The VOC usages shall be recorded monthly and reported to OAM quarterly.
- c) A quarterly summary shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage in tons per month. These monitoring conditions are necessary to avoid the requirements of 326 IAC 8-1-6 and 326 IAC 2-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate @ 8,760 hr/yr (ton/yr)	Modeled Concentration (Fg/m3)	OSHA PEL (Fg/m3)	% OSHA PEL
Methylene Chloride	873.18	3824.53	115.3	174,000	7.29
Propylene Oxide	17.82	78.05	115.3	240,000	0.11
Toluene diisocyanate (TDI)	0.21	0.92	115.3	140	2.18

Methodology:

Rate ton/yr = (rate lb/hr)*(hr/yr of operation)*(ton/2000 lbs)

- (b) See attached calculations for detailed air toxic calculations. (Page 2 of 3)

Conclusion

The operation of this Polyurethane Foam Production source shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-7431-00302.

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

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Foamex, L.P.
Source Location:	603 Industrial Parkway, Elkhart, IN 46516
County:	Elkhart
SIC Code:	3086
Operation Permit No.:	T039-7431-00302
Permit Reviewer:	Jeremy Magliaro / EVP

On December 4, the Office of Air Management (OAM) had a notice published in the Truth Publishing, Elkhart, Indiana, stating that Foamex, L.P. had applied for a Part 70 Operating Permit and Enhanced New Source Review for their polyurethane foam production source. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 29, 1997, Foamex, L.P. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows:

Comment #1:

On page 4 of 32, Section A.1 of the Part 70 Operating Permit, the responsible official should be changed from William Forest, Plant Manager to Jerry Gill, Plant Manager.

Response #1:

In Section A.1 of the Part 70 Operating Permit, the responsible official has been changed to read Jerry Gill, Plant Manager.

Comment #2:

On page 4 of 32, Section A.2 of the Part 70 Operating Permit, the wording of "one (1) polyurethane foam production facility which commenced operation in 1982," should be changed to read "one (1) polyurethane foam production pourline which commenced operation in 1982,".

Response #2:

In Section A.2 of the Part 70 Operating Permit, the wording of "one (1) polyurethane foam production facility which commenced operation in 1982," has been changed and now reads "one (1) polyurethane foam production pourline which commenced operation in 1982,".

Comment #3:

On page 25 of 32, Section D.1 of the Part 70 Operating Permit, "one (1) polyurethane foam production facility which commenced operation in 1982," should be changed to read "one (1) polyurethane foam production pourline which commenced operation in 1982,".

The plant began operations in 1971, the current pourline foam machine was constructed and began operating in 1982.

Response #3:

In Section D.1 of the Part 70 Operating Permit, the wording of "one (1) polyurethane foam production facility which commenced operation in 1982," has been changed to read "one (1) polyurethane foam production pourline which commenced operation in 1982,".

Comment #4:

On page 1 of 9 of the Technical Support Document, under the heading "Unpermitted Emission Units and Pollution Control Equipment", the statement "one (1) polyurethane foam production facility commencing operation in 1982," should be changed to read "one (1) polyurethane foam production pourline commencing operation in 1982."

Response #4:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On page 1 of 9 of the Technical Support Document, under the heading *Unpermitted Emission Units and Pollution Control Equipment*, "one (1) polyurethane foam production facility commencing operation in 1982," should read "one (1) polyurethane foam production pourline commencing operation in 1982."

Comment #5:

On page 6 of 9 of the Technical Support Document, under the heading "Federal Rule Applicability" paragraph (1), the TDI storage tanks were constructed in 1970 not 1982.

Response #5:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On page 6 of 9 of the Technical Support Document, under the heading "Federal Rule Applicability" under paragraph (1), the date of construction of the toluene diisocyanate (TDI) storage tanks was incorrectly stated as being constructed in the year 1982. The correct date of construction is 1970. The paragraph should have read as follows:

- (1) The toluene diisocyanate (TDI) storage tanks (see Insignificant Activities) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Kb, (VOC Storage Tank Standard), because they were constructed in 1970. The VOC Storage Tank Standard (40 CFR 60 Subpart Kb) only applies to tanks constructed after July 23, 1984. Therefore, this standard does not apply.

Comment #6:

On pages 1 and 2 of Appendix A of the Technical Support Document, the columns "Limited VOC pounds per hour" and "Limited HAP pounds per hour" should be removed from the table. The plant cannot operate with these pound per hour limitations. These limitations also reduce our operational flexibility.

Foamex will limit the operating hours so that the VOC emissions are limited to 24 tons per year. Also, Note 2 on pages 1 and 2 of Appendix A should read "At a 30.39% material usage limitation or an operating hour limitation of 2,700 hours, VOC emissions are limited to 24 tons per year, therefore, 326 IAC 8-1-6 does not apply."

Response #6:

On pages 1 and 2 of Appendix A of the Technical Support Document, the columns "Limited VOC pounds per hour" and "Limited HAP pounds per hour" have been removed from the table. Note 2 on pages 1 and 2 of Appendix A which reads:

- (2) "At a 30.39% material usage limitation, VOC emissions are limited to 24 tons per year, therefore, 326 IAC 8-1-6 does not apply."

shall not be changed to include "or an operating hour limitation of 2,700 hours". The Permittee is limited to emit less than 25 tons per year from the pourline facility. This limit may be achieved by means of a material usage limitation(s), limited operating hours, raw material substitutions, or any other scenario which reduces VOC emissions below 25 tons per year. Therefore, a specific operating hour limitation was not specified.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **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.**

2. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.
3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
 - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

5. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

~~The notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
7. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or**
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
9. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

11. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

12. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM 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) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. Condition C.1 is revised to change the overall source to an amount "less than" the applicable limit.

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(b) The total source potential ~~emissions to emit~~ of VOC are less than 250 tons per ~~365 consecutive day period~~ **year**. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential ~~emissions to emit~~ to 250 tons per ~~twelve (12) consecutive month period~~ **year**, from the equipment covered in this permit this source, shall **cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change** ~~require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~

15. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.3 (Opacity) has been revised as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible Emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity in any one (1) six (6) minute averaging period in twenty four (24) consecutive readings,~~ as determined in 326 IAC 5-1-4.
- (b) ~~Visible Emissions Opacity~~ shall not exceed sixty percent (60%) opacity 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.

17. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised to clarify the requirement.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

18. Conditions C.7 (Asbestos Abatement Projects-Accreditation) and C.12 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
19. Condition C.8 (now re-numbered C.9) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.9 Performance Testing ~~[326 IAC 3-2.4]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.4~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. Condition C.9 (now re-numbered C.10) (Compliance Schedule) has been revised to more closely match the rule language.

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

21. Condition C.10 (now re-numbered C.11) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.11 (now re-numbered as C.12) (Monitoring Methods) has been revised to clarify the requirement

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23. Condition C.13 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
24. Condition C.14 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

25. Condition C.15 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

26. Condition C.16 (a) has been revised to clarify the certification requirement for the emission statement.

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)]~~[326 IAC 2-7-5(7)]~~~~[326 IAC 2-7-19(c)]~~~~[326 IAC 2-6] [326 IAC 2-7-19 (e)]~~

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

27. Condition C.18 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~]**[326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.**

28. Condition C.19 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- (b) **The report required in (a) of this condition and** reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

29. The facility description box in Section D is revised to include the rule citation:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

30. 40 CFR Part 63 was recently amended by adding Subpart III, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production, consisting of parts 63.1290 through 63.1309. This source is now subject to 40 CFR Part 63, Subpart III. The Federal Rule Applicability section of the TSD is revised to include a discussion of the applicability of Subpart III. Part (2) of the section is revised to read as follows:
- (2) ~~There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source. A NESHAP for flexible polyurethane foam production facilities under the CAA 112(d) (40 CFR Part 63) is currently being considered for promulgation in December 1997. Foamex, L.P. will comply with the applicable NESHAP standards if and when finalized.~~
This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.1290 through 63.1309, Subpart III) because it (1) Produces flexible polyurethane foam; (2) Emits a HAP; and (3) The foam manufacturing process is located at a plant site that is a major source, as defined in 40 CFR 63.2 of subpart A. Since this is an existing source, it shall be in compliance with all provisions of this subpart no later than October 8, 2001.

The foam manufacturing process at this source is a slabstock polyurethane foam manufacturing operation. The Flexible Polyurethane Foam Production NESHAP consists of the following sections:

- 63.1290 Applicability
 - 63.1291 Compliance Schedule
 - 63.1292 Definitions
 - 63.1293 Standards for slabstock flexible polyurethane foam production
 - 63.1294 Standards for slabstock flexible polyurethane foam production—diisocyanate emissions
 - 63.1295 Standards for slabstock flexible polyurethane foam production—HAP auxiliary blowing agent (ABA) storage vessels
 - 63.1296 Standards for slabstock flexible polyurethane foam production—HAP ABA equipment leaks
 - 63.1297 Standards for slabstock flexible polyurethane foam production—HAP ABA emissions from the production line
 - 63.1298 Standards for slabstock flexible polyurethane foam production—HAP emissions from equipment cleaning
 - 63.1299 Standards for slabstock flexible polyurethane foam production—sourcewide emission limitation
 - 63.1300 Standards for molded flexible polyurethane foam production
 - 63.1301 Standards for rebond foam production
 - 63.1302 Applicability of Subpart A requirements
 - 63.1303 Monitoring requirements
 - 63.1304 Testing requirements
 - 63.1305 Alternative means of emission limitation
 - 63.1306 Reporting requirements
 - 63.1307 Record keeping requirements
 - 63.1308 Compliance demonstrations
 - 63.1309 Delegation of authority
- Appendix to Subpart III—Tables

A copy of this rule is attached.

31. New sections have been added to section D.1 to include the recently promulgated NESHAP for flexible polyurethane foam production. Three new conditions have been added numbered D.1.1 through D.1.3. The new sections and conditions read as follows:

Applicable Requirements [326 IAC 2-7-5]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

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

D.1.2 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63, Subpart III]

This facility is subject to 40 CFR Part 63, Subpart III and shall be in compliance with all applicable provisions of this rule no later than October 8, 2001. The Flexible Polyurethane Foam Production NESHAP consists of the following sections:

- 63.1290 Applicability
- 63.1291 Compliance Schedule
- 63.1292 Definitions
- 63.1293 Standards for slabstock flexible polyurethane foam production
- 63.1294 Standards for slabstock flexible polyurethane foam production—diisocyanate emissions
- 63.1295 Standards for slabstock flexible polyurethane foam production—HAP auxiliary blowing agent (ABA) storage vessels
- 63.1296 Standards for slabstock flexible polyurethane foam production—HAP ABA equipment leaks
- 63.1297 Standards for slabstock flexible polyurethane foam production—HAP ABA emissions from the production line

- 63.1298 Standards for slabstock flexible polyurethane foam production—HAP emissions from equipment cleaning
- 63.1299 Standards for slabstock flexible polyurethane foam production—sourcewide emission limitation
- 63.1300 Standards for molded flexible polyurethane foam production
- 63.1301 Standards for rebond foam production
- 63.1302 Applicability of Subpart A requirements
- 63.1303 Monitoring requirements
- 63.1304 Testing requirements
- 63.1305 Alternative means of emission limitation
- 63.1306 Reporting requirements
- 63.1307 Record keeping requirements
- 63.1308 Compliance demonstrations
- 63.1309 Delegation of authority
- Appendix to Subpart III—Tables

A copy of this rule is attached.

Notifications [326 IAC 2-7-5]

D.1.3 Notification Requirements [326 IAC 2-7-5] [40 CFR 63.1306]

The Permittee shall comply with all reporting provisions specified in 40 CFR Part 63, Subpart III, and in particular:

- (a) The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b) (Subpart A, General Provisions) by February 4, 1999, 120 days after promulgation of this NESHAP. In 40 CFR 63.9(b)(b), the Permittee is required to provide the following information:
 - (1) The name and address of the Permittee;
 - (2) The address (i.e., physical location) of the affected source;
 - (3) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

- (4) **A brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant, or if a definitive identification is not yet possible, a preliminary identification of each point of emission for each hazardous air pollutant; and**
- (5) **A statement of whether the affected source is a major source or an area source.**
- (b) **The Permittee shall submit a notification of compliance status report no later than 180 days after the compliance date, which is April 6, 2002. The notification of compliance status report shall contain all the information required in 40 CFR 63.1306(d) that is appropriate for the facility.**
- (c) **The reports required in (a) and (b) of this condition shall be submitted to:**

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

and

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

32. Condition D.1.1 (Volatile Organic Compounds) (now re-numbered D.1.4), has been revised to clarify the VOC usage limitation:

D.1.44 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2]

-
- (a) Total volatile organic compounds (VOC) emissions from the pourline facility shall be limited to **less than 25 tons per twelve (12) consecutive month period, rolled monthly** ~~no more than a fixed monthly limit of 2 tons of VOC per month.~~ This limit consists of the following:
- 1) VOC usage in the blowing agent; and
 - 2) VOC emissions from all other ~~unreacted raw material chemicals and intermediates~~ **raw materials** used in the pourline which shall be calculated using emission factors based on May, 1990 stack testing performed on the pourline ~~(see Appendix A, page 1 of 2 for detailed emissions calculations).~~ When future stack testing is performed, the latest stack test results shall be used to calculate VOC emissions from the pourline.
- 3) VOC usage from clean-up and dilution solvents.**
- (b) Any change or modification to the pourline operation facility that results in an increase in facility VOC emissions to levels which exceed 25 tons per year, shall be subject to 326 IAC 8-1-6 (General Reduction Requirements).

33. Condition D.1.3 (Testing Requirements) (now re-numbered as D.1.6), has been revised to clarify the testing requirement:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform VOC testing, **to establish a worst-case VOC emission factor for Condition D.1.4(a)(2)** to confirm the VOC emissions stated in ~~D.1.4~~, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. The Permittee shall conduct the performance test in accordance with Section C - Performance Testing. **In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

34. Condition D.1.4 (Volatile Organic Compounds) (now re-numbered D.1.7), has been revised to include new rule citing:

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.4~~ **D.1.4** shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

35. The following changes have been made to the Part 70 permit to reflect the specific operations of the foam production process. Permit Condition No. D.1.5 (now re-numbered as D.1.9) of the Part 70 Operating Permit has been revised to read as follows (changes in bold or strikeout):

D.1.59 Record Keeping Requirements

(a) To document compliance with Condition ~~D.1.4~~ **D.1.4**, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition ~~D.1.4~~ **D.1.4**.

- (1) The amount and VOC content of each raw material, **blowing agent**, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to ~~coatings raw materials~~ and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the ~~coatings raw materials and blowing agent~~ used for each month;
- (4) The cleanup solvent **and dilution solvent** usage for each or month;
- (5) The total VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition ~~D.1.4~~ **D.1.4** the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
36. Condition D.1.8 (VOC Emissions) is a new condition that has been added to the permit. The remainder of Section D has been renumbered accordingly:

D.1.8 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

37. Condition D.1.5(b) (Record Keeping Requirements) (now re-numbered as D.1.9(b)), has been revised to delete certain record keeping parameters that do not apply to the pourline process:
- (b) To document compliance with Condition ~~D.1.4~~ **D.1.4** the Permittee shall maintain a log of ~~daily overspray observations, daily and weekly, and those~~ inspections prescribed by the Preventive Maintenance Plan.
38. Condition D.2.2 (Testing Requirements), has been revised to clarify the testing requirement:

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C -Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

FORMS:

- 1) On the Part 70 Operating Permit Certification Form, on page 28 of 32, the checkbox and wording for "Emergency/Deviation Occurrence Reporting Form" has been deleted.
- 2) On the Emergency/Deviation Occurrence Reporting Form, page 29 of 32, the wording "attach a signed certification to complete this report" on the bottom of the page has been deleted.
- 3) The Part 70 Quarterly Report Form on page 31 of 32, has been changed to indicate a rolling monthly VOC limit of 25 tons per year, rather than a fixed monthly limit of 2.0 tons per month.
- 4) The Quarterly Compliance Report, page 32 of 32, is now called the Quarterly Compliance Monitoring Report. The changes are shown on the next page.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Foamex, L.P.
 Source Address: 603 Industrial Parkway, Elkhart, Indiana 45616
 Mailing Address: 603 Industrial Parkway, Elkhart, Indiana 45616
 Part 70 Permit No.: T039-7431-00302

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:**~~

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Technical Support Document
Appendix A: Emission Calculations
VOC Emissions
From Foam Production Line

Company Name: Foamex, L.P.
Address City IN Zip: 603 Industrial Parkway, Elkhart, Indiana 45616
TITLE V: T039-7431
Pit ID: 039-00302
Reviewer: Jeremy Magliaro/EVP
Date: October 26, 1997

Potential Uncontrolled Emissions :								
Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Emission Factor (lbs/hr) (1)	Material Usage Rate (gal/hr)	Potential VOC pounds per hour	Potential VOC tons per year
Toluene diisocyanate (TDI) (Stacks 1-8)	10.18	100.00%	0.00%	100.00%	0.21	0.02	0.21	0.92
Propylene Oxide (Stacks 1-11)	10.93	2.00%	0.00%	2.00%	891.00	81.52	17.82	78.05
Total Potential VOC Emissions:							18.03	78.97
Limited VOC Emissions (2)							Limited Material Usage (2)	Limited VOC tons per year
							30.39%	24.00

Note:

- (1) Potential emissions of TDI as a VOC are based on emission factors from worst case facility stack test results conducted in May 1990, at 8760 hours per year. Potential emissions of Propylene Oxide as a VOC are based on actual 1995 blowing agent usage rate of 891lb/hr at 8760 hours per year.
- (2) At a 30.39% material usage limitation, VOC emissions are limited to 24.0 tons per year, therefore, 326 IAC 8-1-6 does not apply.

*The majority of TDI emissions are emitted at the pourline through Stacks 1-8 and negligible amounts are emitted in Stacks 9, 10, and 11 in long bun storage room.

Methodology:

Weight % Organics = Weight % Volatiles - Weight % Water
 Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Volatile
 Potential VOC Tons per Year = Pounds of VOC per hour * (8760 hr/yr) * (1 ton/2000 lbs)

Technical Support Document
Appendix A: Emission Calculations
HAP Emissions
From Foam Production Line

Company Name: Foamex, L.P.
Address City IN Zip: 603 Industrial Parkway, Elkhart, Indiana 45616
TITLE V: T039-7431
Plt ID: 039-00302
Reviewer: Jeremy Magliaro/EVP
Date: October 26, 1997

Potential Uncontrolled Emissions:							
Material	Process	Density (Lb/Gal)	Weight % HAPS	Emission Factor (lbs/hr) (1)	Material Usage Rate (gal/hr)	Potential HAP pounds per hour	Potential HAPS tons per year (2)
Methylene Chloride (Blowing Agent)	Blowing Agent	10.93	98.00%	891.00	81.52	873.18	3824.53
Propylene Oxide (Blowing Agent)	Blowing Agent	10.93	2.00%	891.00	81.52	17.82	78.05
Toluene diisocyanate (TDI) (5)	Pour Line	10.18	100.00%	0.21	0.021	0.21	0.92
Total Potential HAP Emissions:						891.21	3903.50
Limited HAP Emissions						Limited Material Usage Rate (2)	Limited HAP tons per year
						30.39%	1185.99

Note:

(1) Emission factor for the blowing agent is based on actual 1995 usage rate of 891.0 pounds per hour.

Emission factor for TDI based on emission factors from worst case facility stack test results conducted in May 1990.

(2) At a 30.39% blowing agent usage limitation, VOC emissions are limited to 24.0 tons per year, therefore, 326 IAC 8-1-6 does not apply.

The blowing agent used in the pourline process consists of 98% Methylene Chloride and 2% Propylene Oxide.

It is assumed that 100% of the blowing agent used is emitted through Stacks 1 thru 11(S/V ID 1,2,3,4,5,6,7,8,9,10,11).

Methodology:

Weight % HAP = Weight % HAP - Weight % Water

Potential HAP Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP (based on worst case mass balance)

Potential HAP Tons per Year = Pounds of HAP per hour * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10**

Company Name: Foamex, L.P.
Address City IN Zip: 603 Industrial Parkway, Elkhart, Indiana 45616
Title V: T039-7431
Plt ID: 039-00302
Reviewer: Jeremy Magliaro/EVP
Date: October 26, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.7

58.6

Heat Input Capacity includes:
one (1) natural gas boiler rated at 6.69 MMBtu/hr (see Insignificant Activities)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.35	0.35	0.02	2.93	0.17	0.62

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

**Addendum to the
Technical Support Document
Appendix A: Emission Calculations
HAP Emissions
From Foam Production Line**

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Reviewer: Jeremy Magliaro/EVP
Date: October 26, 1997

Potential Uncontrolled Emissions:							
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Propylene Oxide (Blowing Agent)	Blowing Agent	10.93	2.00%	891.00	81.52	17.82	78.05
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Total Potential HAP Emissions:						891.21	3903.50
Limited HAP Emissions						Limited Material Usage Rate (2)	Limited HAP tons per year
						30.39%	1185.99

Note:

(1) Emission factor for the blowing agent is based on actual 1995 usage rate of 891.0 pounds per hour.

Emission factor for TDI based on emission factors from worst case facility stack test results conducted in May 1990.

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Methodology:

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Potential HAP Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP (based on worst case mass balance)

Potential HAP Tons per Year = Pounds of HAP per hour * (8760 hr/yr) * (1 ton/2000 lbs)

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Total Potential VOC Emissions:							18.03	78.97
							Limited Material Usage (2)	Limited VOC tons per year
Limited VOC Emissions (2)							30.39%	24.00

Note:

- (1) Potential emissions of TDI as a VOC are based on emission factors from worst case facility stack test results conducted in May 1990, at 8760 hours per year. Potential emissions of Propylene Oxide as a VOC are based on actual 1995 blowing agent usage rate of 891lb/hr at 8760 hours per year.
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 Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % Volatile
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