

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

**Foamex, L.P.
2211 South Wayne St.
Auburn, Indiana 46706**

(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.: T033-7625-00047	
Issued by: Janet G. McCabe, 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). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary flexible polyurethane foam production plant.

Responsible Official: Adrien Bobeck, Plant Manager
Source Address: 2211 South Wayne St., Auburn, Indiana 46706
Mailing Address: same as above
SIC Code: 3086
County Location: Dekalb
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under 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:

- (1) One (1) flat block pour line, identified as EU-PL, with a maximum capacity of producing 4.8×10^8 board feet of foam per year, and exhausted through seven (7) stacks (S/V ID 1,2,3,4,5,6,7). This facility was installed in November of 1977;
- (2) two (2) Flame Laminators, identified as Flame Laminator #1 (EU-F1) and Flame Laminator #2 (EU-F2), each with a maximum capacity to finish 3.504×10^8 square feet per year of polyurethane foam. Flame Laminator #1, installed in 1978, is exhausted through two (2) stacks (S/V ID 15,16), and Flame Laminator #2, installed in 1993, is exhausted through one (1) stack (S/V ID 34);
- (3) four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36), respectively;
- (4) one (1) source-wide adhesive application operation, with emissions venting inside the plant; and
- (5) one (1) source-wide chemical solvent usage operation, with emissions venting inside the plant.
- (6) three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986;

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

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

SECTION B

GENERAL CONDITIONS

B.1 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, as set out in this permit in the Section B condition entitled "Permit Shield."

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. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must 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 furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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 January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 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 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);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (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 submittal 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 facility:

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

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.

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).

- (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) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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.
- (d) 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.
- (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.
- (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).
- (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)]
- (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)]

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) 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.

- (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).
- (d) 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) and 326 IAC 2-7-1(40).

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

B.20 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.21 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.22 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.23 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.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of 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]

B.25 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. 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) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 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. 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) 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.

B.27 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.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

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 to emit VOC is limited to 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 to emit to 250 tons per year from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

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.

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

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

C.5 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. This condition is not federally enforceable.

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

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

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 units vented to the control equipment are in operation.

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
(and local agency when applicable)

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.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 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 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).

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

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 may extend compliance schedule 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

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

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

- (a) 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.

- (b) Whenever a condition in this permit requires the measurement of operating hours of the unit or its control device, the gauge employed shall be permanently installed on the unit and shall be equipped with a continuous recorder for documenting the hours of operation. The instrument used shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

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.

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.
- (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 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).

**C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7][326 IAC 2-7-6]
[326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 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).

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

C.17 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]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by *July 1* 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:
 - (1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. 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.18 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][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 of an IDEM, OAM, representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (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.
- (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.20 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.
- (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).

Stratospheric Ozone Protection

C.21 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

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

- (a) One (1) flat block pour line, identified as EU-PL, with a maximum capacity of producing 4.8 x 10⁸ board feet of foam per year, and exhausted through seven (7) stacks (S/V ID 1,2,3,4,5,6,7). This facility was installed in November of 1977;
- (b) two (2) Flame Laminators, identified as Flame Laminator #1 (EU-F1) and Flame Laminator #2 (EU-F2), each with a capacity to finish 3.504 x 10⁸ ft² per year of polyurethane foam. Flame Laminator #1, installed in 1978, is exhausted through two (2) stacks (S/V ID 15,16), and Flame Laminator #2, installed in 1993, is exhausted through one (1) stack (S/V ID 34);
- (c) four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36) respectively;
- (d) one (1) source-wide adhesive application operation, with emissions venting inside the plant; and
- (e) one (1) source-wide chemical solvent usage operation, with emissions venting inside the plant.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

The polyurethane foam production plant shall limit the VOC emissions from the emission units identified as the pourline (EU-PL), flame laminators #1 and #2 (EU-F1, EU-F2), four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), three (3) natural gas boilers (EU-B1,EU-B2,EU-B3) identified in Section D.2, adhesive application operations, and chemical solvent usage, such that total source-wide VOC potential to emit is less than 250 tons per twelve (12) consecutive month period:.

- (a) The VOC usage at the pourline facility identified as (EU-PL) shall be limited such that VOC emissions do not exceed 164.64 tons per twelve (12) consecutive month period. Emissions shall be calculated using the following:
 - (1) Emissions from TDI and MDI usage shall be equal to a 0.12 pounds VOC per hour emission rate;
 - (2) VOC emissions from amine catalyst usage shall be calculated using the following equation:

VOC emissions (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs

- (A) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturers data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.
- (b) The VOC emissions from Flame Laminator #2 (EU-F2) shall be limited to 24.0 tons per year based on the following:
 - (1) This operating limit was based on a stack test emission factor of 6.5 lbs VOC per hour, and a foam burn-off range between 0.015 inches and 0.150 inches of foam. If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly to limit potential VOC emissions from EU-F2 to 24.0 tons per year.
- (c) Flame Laminator #1 (EU-F1) emissions shall be based on a VOC emission rate of 6.5 pounds per hour. If the results of the stack testing required in this permit indicates a higher VOC emission rate, that rate shall be used to determine emissions from EU-F1.
- (d) The VOC emissions from the four (4) rebond molding facilities (EU-R1,EU-R2,EU-R3, EU-R4) are based on a total emission factor of 0.14 lbs VOC/hr. This factor shall be used when calculating VOC emissions. If the results of the stack testing required in this permit indicates a higher VOC emission rate, that rate shall be used to determine emissions from the four (4) rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4).

Compliance with these conditions shall limit source-wide VOC emissions to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The facility identified as Flame Laminator #2 (EU-F2) shall be limited to no more than 7,380 hours of operation per twelve (12) consecutive month period. This operating limit is required to limit the potential to emit VOC to less than 25.0 tons per year to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

- (a) This operating limit was based on a stack test emission factor of 6.5 lbs VOC per hour, and a foam burn-off range between 0.015 inches and 0.150 inches of foam. If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly to limit the potential to emit VOC from EU-F2 to less than 25.0 tons per year.

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) rebond mold unit facilities (EU-R1, EU-R2, EU-R3, EU-R4) shall not exceed a total 18.66 pounds per hour when operating at a total process weight rate of 9.6 tons per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the total allowable PM emission rate from the two (2) propane-fired (natural gas backup) flame laminator machines (EU-F1, EU-F2) shall not exceed 4.1 pounds per hour when operating at a total process weight rate of 2,000 pounds per hour.

The pounds per hour limitation's were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pourline (EU-PL), Flame Laminator #1 (EU-F1), and Flame Laminator #2 (EU-F2) and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) The following VOC testing requirement applies to the following facilities:

- (i) pourline (EU-PL);
- (ii) flame laminators #1 and #2 (EU-F1, EU-F2);
- (iii) rebond molding (EU-R1, EU-R2, EU-R3, EU-R4);

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 and D.1.2, 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.

(b) The following PM and PM-10 testing requirement applies to the rebond molding facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 (S/V ID 28,29,35,36);

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A, or other 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.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 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.

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

D.1.8 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 (tertiary amine) content of each amine catalyst, raw material, adhesive, and chemical 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 month of use;
 - (3) The volume weighted VOC content of the adhesives and solvents used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage, including tertiary amine usage, for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.1 and D.1.2, a cumulative operating time meter, equipped with a continuous recorder for documenting the time of operation for the Flame Laminator #2 (EU-F2), shall be permanently installed and operated at all times when the unit is in operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 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 CONDITION

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

Three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1,EU-B2,EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks identified as Stacks 31 thru 33 (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

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

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

- (a) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emissions Limitations for Sources of Indirect Heating), the particulate emissions from each of Boiler #1 (EU-B1 and Boiler #2 (EU-B2), (each rated at 10.5 mmBtu per hour) shall be limited to 0.6 pounds per mmBtu heat input each.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.5 mmBtu per hour heat input Boiler #3 (EU-B3) (installed in 1986) shall be limited to 0.44 pounds per mmBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where} \quad Pt = \text{Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.}$$

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity.

Compliance Determination Requirements

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the Particulate Matter (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: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-7625-00047

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 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: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-7625-00047

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: _____

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-7625-00047

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Part 70 Quarterly Report

Source Name: Foamex, L.P.
 Source Address: 2211 South Wayne St., Auburn, IN 46706
 Mailing Address: 2211 South Wayne St., Auburn, IN 46706
 Part 70 Permit No.: T033-7625-00047
 Facility: Source-wide
 Parameter: VOC Emissions
 Limit: The polyurethane foam production plant shall limit the VOC emissions from the emission units identified as the pourline (EU-PL), flame laminators #1 and #2 (EU-F1, EU-F2), four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), three (3) natural gas boilers (EU-B1,EU-B2,EU-B3), adhesive application operations, and chemical solvent usage such that total source-wide VOC emissions do not exceed 249 tons per twelve (12) consecutive month period.

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons/year)
	This month	Previous 11 months	12 Month Total
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 Quarterly Report

Source Name: Foamex, L.P.
 Source Address: 2211 South Wayne St., Auburn, IN 46706
 Mailing Address: 2211 South Wayne St., Auburn, IN 46706
 Part 70 Permit No.: T033-7625-00047
 Facility: Pourline (EU-PL)
 Parameter: VOC emissions shall be limited to 164.64 tons per twelve (12) consecutive month period..
 Limit: The VOC emissions from the pourline (EU-PL) shall be limited based on the following: Emissions from TDI and MDI usage shall be equal to 0.12 pounds VOC per hour emission rate as determined in 1990 stack testing; VOC emissions from amine catalyst usage shall be calculated using the following equation:

$$\text{VOC emissions (tons)} = \text{Amine catalyst usage (gal)} \times \text{density (lbs/gal)} \times \text{tertiary amine (weight \%)} \times 1 \text{ ton} / 2000 \text{ lbs}$$

YEAR: _____

Month	Total Tertiary Amine Usage (pounds)	Total Pourline Operating Hours	Total VOC Emissions from Pourline This Month (tons)	Total VOC Emissions from Pourline-Previous 11 months (tons)	Total VOC Emissions from Pourline -12 Month Total (tons/yr)
1					
2					
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 Quarterly Report

Source Name: Foamex, L.P.
 Source Address: 2211 South Wayne St., Auburn, IN 46706
 Mailing Address: 2211 South Wayne St., Auburn, IN 46706
 Part 70 Permit No.: T033-7625-00047
 Facility: Flame Laminator #2 (EU-F2)
 Parameter: VOC
 Limit: The total emissions of VOC from the facility identified as Flame Laminator #2 (EU-F2) shall be limited to no more than 24.0 tons VOC per twelve (12) consecutive month period, which is equivalent to an operating hour limitation of 7,380 hours per twelve (12) consecutive month period, to avoid 326 IAC 8-1-6. Based on a VOC emission rate of 6.5 pounds per hour, as determined in the March, 1995 stack test of a similar unit at another Foamex, L.P. source.

YEAR: _____

Month	Column 1	Column 2	Column 1 x Column 2
	Operating hours	6.5 lbs VOC per hour; or latest stack test result	VOC Emissions (tons)
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 MONITORING REPORT**

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-7625-00047

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 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.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
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: 2211 South Wayne St., Auburn, Indiana 46706
County: Dekalb
SIC Code: 3086
Operation Permit No.: T033-7625-00047
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

The source currently has no permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (1) one (1) flat block pour line with a maximum capacity of producing 4.8×10^8 board feet of foam per year, exhausted through seven (7) stacks (S/V ID 1,2,3,4,5,6,7); and one (1) round block pour line with a maximum capacity of producing 4.8×10^8 board feet per year, exhausted through seven (7) stacks (S/V ID 8,9,10,11,12,13,14). Both facilities cannot operate at the same time and are considered as one (1) emission unit identified as EU-PL. Both were installed in November of 1977;
- (2) two (2) Flame Laminators, identified as Flame Laminator #1 (EU-F1) and Flame Laminator #2 (EU-F2), each with a maximum capacity to finish 3.504×10^8 square feet per year of polyurethane foam. Flame Laminator #1, installed in 1978, is exhausted through two (2) stacks (S/V ID 15,16), and Flame Laminator #2, installed in 1993, is exhausted through one (1) stack (S/V ID 34);
- (3) four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36), respectively;
- (4) one (1) source-wide adhesive application operation, with emissions venting inside the plant; and
- (5) one (1) source-wide chemical solvent usage operation, with emissions venting inside the plant.

- (6) three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986;

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

All unpermitted emission units will be reviewed under ENSR.

There are no new emission units at the source during this review.

Insignificant Activities

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

- (1) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Propane or liquified petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) 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.
- (4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (5) 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 use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (6). The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (7) Closed loop heating and cooling systems.
- (8) Infrared cure equipment.
- (9) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (10) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

- (11) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (12). Heat exchanger cleaning and repair.
- (13) Process vessel degassing and cleaning to prepare for internal repairs.
- (14). 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.
- (15) Paved and unpaved roads and parking lots with public access.
- (16) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (17) Gasoline emergency generators not exceeding 110 horsepower.
- (18) Stationary fire pumps.
- (19) Purge double block and bleed valves.
- (20) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).
- (21) 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) TDI/MDI Storage Tanks;
 - b) Filler handling and storage;
 - c) Hot wire Cutter Stations
 - d) Hot wire Seamers;
 - e) Hot Roll Laminator
- (22) The following activities not previously identified with emissions equal to or less than insignificant thresholds;
 - a) Ink handling and applications - VOC emissions less than 3 lb/hr or 15 lb/day;
 - b) Resin storage tanks -VOC emissions less than 3 lb/hr or 15 lb/day;
 - c) Amines storage tanks - VOC emissions less than 3 lb/hr or 15 lb/day;
 - d) Fire retardant storage tanks - VOC emissions less than 3 lb/hr or 15 lb/day;
 - e) Hot roll (drum) Laminator - VOC emissions less than 3 lb/hr or 15 lb/day;

Enforcement Issue

- (a) IDEM is aware that the unpermitted equipment listed in this document has been constructed and operated prior to receipt of the proper permit.
- (b) 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 13, 1996.

A notice of completeness letter was mailed to Foamex, L.P. on January 17, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (four (4) 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	greater than 250
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)
Methylene Chloride	greater than 10
Vinyl Acetate	greater than 10
Toluene diisocyanate (TDI)	less than 10
Methylenediphenyl diisocyanate (MDI)	less than 10
Hydrochloric acid	greater than 10
Hydrogen fluorides	less than 10
Hydrocyanic acid	less than 10
Formaldehyde	less than 10
Propylene Oxide	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) 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.
- (c) **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. This information reflects the 1996 emission data as submitted by the applicant in their Part 70 application..

Pollutant	Actual Emissions (tons/year)
PM	22.60
PM-10	18.36
SO ₂	0.04
VOC	32.80
CO	22.90
HAP (Methylene Chloride)	90.00
NO _x	21.40

Limited Potential to Emit

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

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Pourline (EU-PL) (1)				164.64			7045.38
Flame Laminator #2 (EU-F2) (2)	6.74	6.74	.01	24.0	17.06	5.88	58.94
Total Emissions				249			

- (1) The pourline (EU-PL) shall be limited to emit no more than 164.64 tons of VOC per year.. This limit, in conjunction with other VOC limitations, is necessary to limit source-wide VOC emissions to no more than 249 tons/year to avoid 326 IAC 2-2.
- (2) The emissions from Flame Laminator #2 (EU-F2) shall be limited 24 tons/yr to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

*See Appendix A (four (4) pages) for detailed emission calculations.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not designated

- (a) 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. Dekalb County has been designated as attainment or unclassifiable 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:

- (a) 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.
- (b) 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

- (a) The three natural gas-fired boilers identified as EU-B1, EU-B2, and EU-B3, even though their ratings are greater than 10.0 million (mm) British thermal units (Btu) per hour, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40(c), Subpart Dc), because the three boilers were all constructed prior to June 9, 1989. The New Source Performance Standard (40 CFR 60.40) only applies to those facilities for which construction, modification, or reconstruction is commenced after June 9, 1989. The three natural gas-fired boilers are also not subject to the New Source Performance Standard 40 CFR 60.40 (Subpart Db) because their ratings are less than 100 mmBtu/hr. Therefore, 40 CFR 60.40 (Subpart Db) does not apply.
- (b) The raw material storage tanks classified as insignificant facilities at the Foamex, L.P. plant are not subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60, Subpart K, Ka), because they do not service petroleum liquids. The New Source Performance Standards (40 CFR 60, Subpart K, Ka) only apply to those storage vessels that service petroleum liquids. The standards are therefore not applicable to the Foamex, L.P. raw material storage tanks.

- (c) The volatile organic liquid storage tanks classified as insignificant facilities at the Foamex, L.P. Plant are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Kb), because the tanks were constructed prior to July 23, 1984. The New Source Performance Standard (40 CFR 60, Subpart Kb), only applies to those tanks which for which construction, reconstruction, or modification is commenced after July 23, 1984.
- (d) 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. Foamex, L.P. will comply with the applicable NESHAP if and when the standard is finalized.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Total source-wide VOC emissions shall be limited to no more than 249 per twelve (12) consecutive month period. This rolling monthly limit is equivalent to limiting the source-wide VOC emissions to 249 tons per year to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). The following operations shall be limited as follows to comply with the source-wide VOC emissions limit:

- (a) VOC usage at the pourline (EU-PL) shall be limited such that emissions do not exceed 164.64 tons of VOC per twelve (12) consecutive month period. This limit was based on TDI emission rate of 0.12 pounds per hour, and VOC emissions from the flash-off of tertiary amine catalysts.
- (b) VOC emissions from Flame Laminator #2 (EU-F2) shall be limited to 24.0 tons per twelve (12) consecutive month period to avoid the requirements of 326 IAC 8-1-6 (BACT).

These operating limitations combined with VOC emissions from other operations at the source, (see Appendix A, page 1 for a detailed emissions summary) shall limit source-wide VOC emissions to no more than 249 tons per 365 consecutive day period:

$164.64 \text{ tons/yr (EU-PL)} + 52.47 \text{ tons/yr (EU-F1,2)} + 0.61 \text{ tons/yr (EU-R1-4)} + 30.82 \text{ tons/yr (adhesive and chemical solvent usage)} + 0.38 \text{ tons/yr (EU-B1-4)} = 249.00 \text{ tons VOC/yr};$

Since VOC emissions will be limited to less than 250 tons per year, 326 IAC 2-2 (Prevention of Significant Deterioration) 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 one hundred (100) tons per year of VOC. 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 July 1 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 plant shall comply with the fugitive dust limitations outlined in 326 IAC 6-4-1 (Fugitive Dust Emissions). Fugitive dust emissions shall not be visible crossing the boundary or property line of the plant.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Matter Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emissions Limitations for Sources of Indirect Heating), the particulate emissions from Boiler #1 (EU-B1) and Boiler #2 (EU-B2), (each rated at 10.5 mmBtu per hour and constructed in 1978) shall each be limited to 0.6 pounds per mmBtu heat input.

Using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \quad \text{where: } C = 50 \text{ micrograms per cubic meter;}$$

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.(21.0);

N= Number of stacks in the fuel burning operation (2);

a= Plume rise factor (the value 0.67 shall be used for Q less than or equal to 1,000 mmBru/hr heat input;

h= stack height in feet (27.5).

$$Pt = \frac{50 \times 0.67 \times 27.5}{76.5 \times 21.0^{0.75} \times 2^{0.25}} = 1.04 \text{ lb/mmBtu for each boiler;}$$

Pursuant to 326 IAC 6-2-3(e), particulate emissions from all facilities used for indirect heating purposes shall not exceed 0.6 lb/mmBtu for each boiler. Therefore, the allowable emission from the wood-fired boiler will be truncated to 0.6 lb PM/mmBtu.

The allowable PM10 emissions are equal to 27.59 tons per year based on the following calculation:

$$0.6 \text{ lb/mmBtu} \times 10.5 \text{ mmBtu/hr} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lb} = 27.59 \text{ tons PM / yr}$$

The potential PM emissions from EU-B1 and EU-B2 are equal to 0.63 tons per year (see Appendix A, page 4 of 4 for detailed emission calculations), therefore each 10.5 mmBtu per hour boiler is in compliance with 326 IAC 6-2-3 (Emissions Limitations for Sources of Indirect Heating).

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.5 mmBtu per hour heat input Boiler #3 (EU-B3), (installed in 1986) shall be limited to 0.44 pounds per mmBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where } Pt = \begin{array}{l} \text{Pounds of particulate matter emitted per million} \\ \text{Btu (lb/mmBtu) heat input.} \end{array}$$
$$Q = \begin{array}{l} \text{Total source maximum operating capacity rating} \\ \text{in million Btu per hour (mmBtu/hr) heat input.} \\ (10.5 + 10.50 + 10.5 + 1.75 + 0.73) = 34.0 \\ \text{mmBtu/hr} \end{array}$$

$$Pt = 1.09/34^{0.26} = 0.44 \text{ lb/mmBtu heat input}$$

The allowable PM emissions are equal to 20.24 tons per year based on the following:

$$0.44 \text{ lb/mmBtu} \times 10.5 \text{ mmBtu/hr} \times 8760 \text{ hr/yr} \times 2000 \text{ lb/ton} = 20.24 \text{ tons/yr PM}_{10}$$

The potential PM emissions from EU-B3 are equal to 0.63 tons per year (see Appendix A, page 4 of 4 for detailed emission calculations), therefore EU-B3 is in compliance with 326 IAC 6-2-4 (Emissions Limitations for Sources of Indirect Heating).

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4) and from Flame Laminators #1 and #2 (EU-F1, EU-F2) shall be limited by the following:

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

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

- (1) Rebond mold unit facilities (EU-R1, EU-R2, EU-R3, EU-R4) shall not exceed a total of 18.66 pounds per hour when operating at a total process weight rate of 9.6 tons per hour:

$$E = 4.10 (9.6)^{0.67}$$
$$E = 18.66 \text{ lbs/hr} = 81.73 \text{ tons per year;}$$

The four (4) rebond molding facilities have actual PM/PM-10 emissions of 39.0 tons per year in compliance with 326 IAC 6-3-2.

- (2) Flame Laminator #1(EU-F1) and Flame Laminator #2 (EU-F2) shall not exceed a total of 4.1 pounds per hour when operating at a total process weight rate of 2,000 pounds per hour.

$$E = 4.10 (1)^{0.67}$$

$$E = 4.1 \text{ pounds per hour} = 18.0 \text{ tons per year};$$

The Flame Laminators have actual PM/PM-10 emissions of 16.0 tons per year in compliance with 326 IAC 6-3-2.

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

VOC emissions from Flame Laminator #2 (EU-F2) shall be limited to 24.0 tons per year to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements). Based on a VOC emission factor of 6.5 pounds per hour from the incomplete combustion of non-volatile foam, as determined in the March, 1995 stack test of a similar unit at another Foamex, L.P. source, the 24.0 ton per year emission limit is equivalent to limiting the material throughput on the laminator to 4.2831×10^8 square feet of foam per twelve (12) consecutive month period.

$$(6.5 \text{ lb VOC/hr}) * (1 \text{ ton}/2000 \text{ lb}) * (8760 \text{ hrs/yr}) = 28.47 \text{ tons VOC/yr};$$

$$(24.00 \text{ tons VOC/yr}) / (28.47 \text{ tons VOC/yr}) = 0.843; \text{ and}$$

$$(6.5 \text{ lb VOC/hr}) / 58,000 \text{ sq ft foam/hr} = 6.5 \text{ lb VOC}/58,000 \text{ sq ft of foam}; \text{ therefore}$$

$$0.843 * (6.5 \text{ lb VOC/hr}) = 5.48 \text{ lb VOC/hr}; \text{ and } 0.843 * (58,000) = 48,894 \text{ sq ft. of foam/hr}$$

$$(48,894 \text{ sq ft. foam/hr}) * (8760 \text{ hrs/yr}) = 4.2831 \times 10^8 \text{ square feet of foam per year};$$

This shall limit VOC emissions to no more than 24.0 tons per twelve (12) consecutive month period. If the stack testing required in this permit indicates a higher VOC emission rate, the limited material throughput shall be adjusted accordingly. (See Appendix A, page 2 of 4 for detailed emissions calculations).

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 compliance monitoring requirements applicable to this source are as follows:

- (1) The polyurethane foam production plant shall limit source-wide VOC emissions to no more than 249 tons per twelve (12) consecutive month period. This limit consists of VOC emissions from the following emission units:
 - (A) The VOC usage at the pourline facility identified as (EU-PL) shall be limited such that VOC emissions do not exceed 164.64 tons per twelve (12) consecutive month period. This limitation consists of the following VOC emissions:
 - (i) VOC emissions from amine catalyst usage shall be calculated using the following equation:

$$\text{VOC emissions (tons)} = \text{Amine catalyst usage (gal)} \times \text{density (lbs/gal)} \times \text{tertiary amine (weight \%)} \times 1 \text{ ton} / 2000 \text{ lbs}$$
 - (a) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturers data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.
 - (b) Within 24 to 36 months from the date of issue of this permit, compliance stack testing shall be performed on the pourline (EU-PL) for VOC. These emission factors shall be used in future emissions calculations in determining compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) for the source. If the stack testing indicates a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly. (See page 1 and 2, Appendix A, for more detailed emissions calculations).
 - (B) The flame laminating facilities identified as (EU-F1 and EU-F2);
 - (i) The emission unit identified as (EU-F2) shall limit material throughput on the laminator to 4.2804×10^8 square feet of foam per twelve (12) consecutive month period. This will limit the total VOC emissions to 24.0 tons per year based on a VOC emission rate of 6.5 lb/hr, as determined in the March, 1995 stack test on a similar unit. This limit is necessary to avoid the regulations under 326 IAC 8-1-6 (General Reduction Requirements).

- (ii) Within 24 to 36 months from the date of issue of this permit, compliance stack testing shall be performed on EU-F1 and EU-F2 for VOC. These emission factors shall be used in future emissions calculations in determining compliance with 326 IAC 8-1-6 (General Reduction Requirements) for the facility and 326 IAC 2-2 (Prevention of Significant Deterioration) for the source. If the stack testing indicates a higher VOC emission rate, the limited material throughput shall be adjusted accordingly.
- (C) VOC emissions from the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, and EU-R4). Emissions shall be based on a total emission rate of 0.14 pounds per hour, as determined in the September 14, 1993 stack test for TDI.
 - (i) Within 24 to 36 months from the date of issue of this permit, compliance stack testing shall be performed on EU-R1, EU-R2, EU-R3 and EU-R4 for VOC and PM. These emission factors shall be used in future emissions calculations in determining compliance with 326 IAC 6-3-2 (Process Weight Rate) and 326 IAC 2-2 (Prevention of Significant Deterioration) for the source.
- (D) VOC emissions from Boilers #1, #2, and #3 (EU-B1, EU-B2, EU-B3);
- (E) VOC emissions from adhesive application (Building Fugitives); and
- (F) VOC emissions from chemical solvent usage (Building Fugitives);
- (2) A cumulative operating meter, equipped with a continuous recorder for documenting the material throughput for the Flame Laminator #2 (EU-F2), shall be permanently installed on the facility and operated at all times when the unit is in operation. The Permittee shall review the cumulative material throughput from the meter, at least once per week. The instrument(s) used shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (3) A quarterly summary of these records shall be reported to OAM Compliance Section. These reports shall include total monthly VOC emissions from each of the above listed emission units in tons per month and tons per twelve (12) consecutive month period.. These monitoring conditions are necessary to avoid the BACT requirements of 326 IAC 8-1-6 (General Reduction Requirements), and 326 IAC 2-2 (Prevention of Significant Deterioration).

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 using actual stack heights and Good Engineering Practice (GEP) stack heights in the analysis.

The concentrations of these air toxics were 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 @ Limited* (ton/yr)	Modeled Concentration using actual stack heights (Fg/m ³)	Modeled Concentration using GEP stack heights (Fg/m ³)	OSHA PEL (Fg/m ³)	% OSHA PEL (at actual stack height)	% OSHA PEL (at GEP stack height)
TDI	0.48	1.76	359.9	307.1	140	13.02	11.11
MDI	0.48	1.76	359.9	307.1	200	9.11	7.77
MeCl	3600.94	7045.14	359.9	307.1	174,000	41.92	35.77
HCl	13.55	109.34	359.9	307.1	7000	16.17	13.80
Vinyl Acetate	5.00	21.90	359.9	307.1	30,000	0.76	0.64
Formaldehyde	0.50	2.19	359.9	307.1	930	2.44	2.08
HF	0.001	0.01	359.9	307.1	2,500	0.00	0.00
HCN	0.95	7.67	359.9	307.1	5,000	1.59	1.36

* Emission units EU-PL and EU-F2 have limits to avoid 326 IAC 2-2 and 326 IAC 8-1-6, respectively.

Methodology:

$$\text{Rate ton/yr} = (\text{rate lb/hr}) * (\text{hr/yr of operation}) * (\text{ton}/2000 \text{ lbs})$$

- (b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3 of 4)
- (c) Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP) after June 27, 1997, shall comply with the Most Achievable Control Technology (MACT). The equipment reviewed under this Part 70 Operating Permit and Enhanced New Source Review (ENSR) was constructed prior to June 27, 1997, therefore, 326 IAC 2-1-3.4 (New Source Toxics Control) does not apply.

Conclusion

The operation of this polyurethane foam production plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T033-7625-00047**.

**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:	2211 South Wayne St., Auburn, Indiana 46706
County:	Auburn
SIC Code:	3086
Operation Permit No.:	T033-7625-00047
Permit Reviewer:	Jeremy Magliaro / EVP

On February 26, 1998, the Office of Air Management (OAM) had a notice published in the Auburn Evening Star, Auburn, 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 March 25, 1998, Foamex, L.P. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows: (changes are strikeout and bolded for emphasis)

Comment #1:

On page 4 of 40, Section A.2 of the Part 70 Operating Permit, the facility no longer has the Round Block Pour Line and the associated 7 stacks (S/V ID 8,9,10,11,12,13,14). The section should be modified to delete the Round Block as a source.

Response #1:

In Section A.2, page 4 of 40 of the Part 70 Operating Permit, Section D.1, page 28 of 40, of the Part 70 Operating Permit, and page 1 of 13 of the TSD, all references to the Round Block Pour Line and associated stacks have been deleted. The new emission unit description reads as follows:

- (1) one (1) flat block pour line, **identified as EU-PL**, with a maximum capacity of producing 4.8×10^8 board feet of foam per year, **and** exhausted through seven (7) stacks (S/V ID 1,2,3,4,5,6,7). ~~and one (1) round block pour line with a maximum capacity of producing 4.8×10^8 board feet per year, exhausted through seven (7) stacks (S/V ID 8,9,10,11,12,13,14). Both facilities cannot operate at the same time and are considered as one (1) emission unit identified as EU-PL. Both were~~ **This facility was** installed in November of 1977.

Comment #2:

On page 29 of 40, Emission Limitations and Standards - D.1.1(b)(1) Volatile Organic Compounds (VOC): This section incorrectly makes an assumption which correlates material throughput to emissions (tons per year). When operating, the flame laminator (EU-F2) impacts the entire linear width of the foam as it crosses the burner area. However, a very small thickness of foam, approximately 0.039 inches is actually affected (melted). It is the melting of the foam that enables a bond to be made to the substrate and consequently causes emissions.

Example: If the line is run too slow, the foam will char and not bond to the substrate. Conversely, if the line is run too fast, the foam will not melt enough to form a bond with the substrate.

Square footage throughput provides no indication of emissions. Furthermore, process line speed does not indicate emissions either. Foamex process engineers have maximized line speed in an effort to affect the least amount of foam while still maintaining a quality bond to the substrate. Foamex is financially motivated to reduce the amount of foam loss during the lamination process.

Foamex requests the Flame Laminator #2 (EU-F2) emission limits be based on hours of operation. Therefore, the reference to "limiting the material throughput to 4.2804 x 10⁸ square feet of foam per twelve consecutive month period" should be deleted.

Response #2:

From the information presented above, it appears that line speed is not an accurate reflection of emissions. Due to the varying thicknesses of foam produced, the line cannot always run at the same speed. Foamex attempts to minimize the amount of foam "melted", regardless of the foam thickness (see Comment #2, above). This is done to reduce product loss. Given this information, it seems apparent that the hours of operation would be a more appropriate reflection of the emissions recorded from stack testing. The line speed, however, is variable depending on the thickness of the foam being produced. It would not be as accurate of an indicator of emissions as would hours of operation.

On page 10 of 13 of the Technical Support Document (TSD), under 326 IAC 8-1-6 (General Reduction Requirements), the limits on the flame laminating facility (EU-F2) shall be changed to reflect a limited hours of operation for unit EU-F2 of 7,380 hours per year, calculated as follows:

$$\begin{aligned}(6.5 \text{ lb VOC/hr}) \cdot (1 \text{ ton}/2000 \text{ lb}) \cdot (8760 \text{ hrs/yr}) &= 28.47 \text{ tons VOC/yr;} \\ (24.00 \text{ tons VOC/yr}) / (28.47 \text{ tons VOC/yr}) &= 0.843; \\ (8760 \text{ hrs/yr}) \cdot (0.843) &= 7,380 \text{ hrs/yr;} \\ (7,380 \text{ hrs/yr}) \cdot (6.5 \text{ lb VOC/hr}) / (1 \text{ ton}/2000 \text{ lb}) &= 24.00 \text{ tons VOC/yr;} \end{aligned}$$

This limit is based on a burn off range of foam between 0.015 and 0.150 inches, which incorporates various line speeds and various foam thickness. As the line speed increases, the measured burn-off decreases. Conversely, the burn off increases as the line speed decreases. The net result is the same pound per hour VOC emissions. The applicant will perform stack testing to verify that the 6.5 pounds VOC per hour emission factor correlates with the burn off range stated above.

On page 11 of 13 of the Technical Support Document (TSD), under Compliance Requirements (1)(B)(i), the material throughput limitation on EU-F2 shall be changed to limit the hours of operation to 7,380 hours per twelve (12) consecutive month period.

Condition D.1.2 on page 29 of 40 of the Part 70 Operating Permit, has been changed to read as follows (deletions are indicated by ~~strikeout~~, additions are indicated by **boldface**):

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The ~~total emissions of VOC from the facility identified as Flame Laminator #2 (EU-F2) shall be limited to no more than 24.0 tons of VOC per year, which is equivalent to a material throughput limitation of 4.2831×10^8 square feet of foam~~ **7,380 hours of operation** per twelve (12) consecutive month period. This ~~production~~ **operating** limit is required to limit the potential to emit VOC to 24.0 tons per year to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

- (a) This operating limit was based on a **stack test** emission factor of 6.5 lbs VOC per hour, **and a foam burn-off range between 0.015 inches and 0.150 inches of foam.** ~~and was obtained from stack testing.~~ If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited ~~material throughput~~ **hours of operation** shall be adjusted accordingly **to limit the potential to emit VOC from EU-F2 to 24.0 tons per year.**

Condition C.11(b), on page 20 of 40 of the Part 70 Operating Permit, has been changed to read as follows:

C.11 Monitoring Methods [326 IAC 3]

- (b) Whenever a condition in this permit requires the measurement of ~~material throughput~~ **operating hours** of the unit or its control device, the gauge employed shall be shall be permanently installed on the unit and shall be equipped with a continuous recorder for documenting the ~~amount of throughput~~ **hours of operation**. The instrument used shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

The Part 70 Quarterly Reporting Form on page 38 of 40 of the Part 70 Operating Permit has been modified: All references to "a material throughput limitation of 4.2831×10^8 square feet of foam per twelve (12) consecutive month period", have been changed to read "an operating hour limitation of 7,380 hours per twelve (12) consecutive month period".

Comment #3:

On page 30 of 40, of the Part 70 Operating Permit, Condition D.1.6, Volatile Organic Compounds (VOC): Reference to "coating manufacturer" should be deleted from this section; not an applicable process to the Auburn facility.

Response #3:

In Condition D.1.6 on page 30 of 40 of the Part 70 Operating Permit, the reference to "coating manufacturer" has been deleted and replaced with "raw material manufacturer".

Comment #4:

On page 31 of 40 of the Part 70 Operating Permit, Record Keeping Requirements - Condition D.1.7(a)(1): Reference to "coating material" and "coatings" should be removed; not an applicable process to the Auburn facility.

Response #4:

In Condition D.1.7(a)(1) on page 31 of 40, all references to "coating material" and "coatings" have been deleted and replaced with "raw material(s)"

Comment #5:

On page 31 of 40 of the Part 70 Operating Permit, Record Keeping Requirements-D.1.7(a)(2): Cleanup solvents, adhesives, and tertiary amines are used everyday at the Auburn facility. Requesting to keep a record of this fact is extremely redundant and burdensome. Therefore, Foamex requests the above referenced requirement be deleted.

Response #5:

Condition D.1.7(a)(2) has been changed from "A log of the dates of use" to read "A log of the month of use."

Comment #6:

On Page 31 of 40 of the Part 70 Operating Permit, Record Keeping Requirements - Condition D.1.7(a)(3)&(4): The facility does not currently keep daily records on the VOC components of adhesives and cleanup solvent used. However, adhesive usage as well as cleanup solvent is calculated, by material inventory records, on a monthly basis. All adhesives and solvents are pre-approved by the Facility Environmental Health and Safety Coordinator prior to use in production. MSDS are readily available to calculate the VOC component of each material used.

Therefore, Foamex believes that a monthly record keeping of VOC from adhesives and cleanup solvent is more than adequate to ensure VOC emission compliance. Foamex requests D.1.7(a)(3)&(4) to be modified, changing "each day" to "each month".

Response #6:

In Condition D.1.7(a)(3)&(4) on page 31 of 40 of the Part 70 Operating Permit, the daily record keeping requirement for adhesives and cleanup solvents has been modified to a monthly record keeping requirement.

Comment #7

On Page 31 of 40 of the Part 70 Operating Permit, Record Keeping Requirements-D.1.7(a)(5): VOCs (tertiary amines), emitted from the pourline are currently documented in the process chemistry data base and can be provided to meet a monthly record keeping requirement. As previously stated, Foamex believes that a monthly record keeping of tertiary amine usage is more than adequate to ensure VOC emission compliance. Therefore, Foamex requests the above referenced section to be modified, changing "each day", to "each month".

Response #7

In Condition D.1.7(a)(5) on page 31 of 40 of the Part 70 Operating Permit, the daily record keeping requirement for "total VOC usage, including total tertiary amine usage", has been modified to a monthly record keeping requirement.

Comment #8

On Page 31 of 40 of the Part 70 Operating Permit, Record Keeping Requirements-Condition D.1.7(b): The emission limitation on the Flame Laminator #2 (EU-F2) should be based on a unit of measure of pounds per hour (see comment No.2). The facility is currently recording operating hours and therefore can provide daily data demonstrating compliance. A cumulative operating meter is not required. As previously stated, throughput measured in square feet does not provide an indication or correlation to actual emissions and therefore would be considered an inappropriate capital requirement imposed on Foamex.

Response #8

Condition D.1.7(b), on page 31 of 40 of the Part 70 Operating Permit, pursuant to the response to Comment #2, the references to “a cumulative operating meter, equipped with a continuous recorder for documenting the material throughput” have been deleted and changed to read “a cumulative operating time meter, equipped with a continuous recorder for documenting the time of operation” for Flame Laminator #2 (EU-F2).

Pursuant to Comments #4-#8, Condition D.1.7, on pages 30 and 31 of 40 of the Part 70 Operating Permit, has been revised and now reads as follows:

D.1.7 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 ~~daily~~ **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 (tertiary amine) content of each amine catalyst, ~~coating material~~ **raw material**, adhesive, and chemical 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~~ **month** of use;
 - (3) The volume weighted VOC content of the adhesives and solvents used for each ~~day~~ **month**;
 - (4) The cleanup solvent usage for each ~~day~~ **month**;
 - (5) The total VOC usage, including tertiary amine 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 **and D.1.2**, a cumulative operating **time** meter, equipped with a continuous recorder for documenting the ~~material throughput~~ **time of operation** for the Flame Laminator #2 (EU-F2), shall be permanently installed and operated at all times when the unit is in operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit (changes indicated in bold or strikethrough for emphasis):

- 1) On page 5 of 13 of the TSD, the “Limited Potential to Emit” table has been revised to include the limited potential PM emissions from the four (4) rebond mold units (EU-R1 to EU-R4), which are limited in Condition D.1.3(a) of the Part 70 Operating Permit to a total of 18.66 pounds of PM per hour (based on compliance with 326 IAC 6-3 (Process Operations)).

Also included in this revised table is the limited potential PM emissions from both flame laminating facilities (EU-F1, and EU-F2), which are limited in Condition D.1.3(b) of the Part 70 Operating Permit to a total of 4.1 pounds of PM per hour (based on compliance with 326 IAC 6-3 (Process Operations)).

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Pourline (EU-PL) (1)				164.64			7045.38
Flame Laminator #2 (EU-F1,F2) (2)	17.96	17.96	0.02	56.94	40.48	13.97	128.00
Rebond units EU-R1-R4	81.73	81.73					
Total Emissions				249			

- (1) The pourline (EU-PL) shall be limited to emit no more than 164.64 tons of VOC per year.. This limit, in conjunction with other VOC limitations, is necessary to limit source-wide VOC emissions to no more than 249 tons/year to avoid 326 IAC 2-2.
- (2) The VOC emissions from Flame Laminator #2 (EU-F2) shall be limited 24 tons/yr to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements).
- (3) The limited PM emission from the two (2) flame laminators (EU-F1, EU-F2) and from the four (4) rebond mold units EU-R1 to EU-R4, are based on compliance with 326 IAC 6-3 (Process Operations).

*See Appendix A (four (4) pages) for detailed emission calculations

- 2) On page 9 of 13 of the TSD, under 326 IAC 6-3-2 (Process Operations), it should be noted that the potential PM emissions from the four (4) rebond molding facilities (EU-R1 to EU-R4) were based on a PM10 emission factor of 2.2 lbs PM10 per hour per unit from a 1987 stack test performed on a similar unit at Foamex, L.P. in Corry, PA.

The potential PM emissions from the two (2) flame laminators (EU-F1 and EU-F2) were based on March 1995 stack test results from a similar unit at Foamex, L.P. in Santa Teresa, New Mexico.

- 3) In Condition D.1.5(b), on page 30 of 40 of the Part 70 Operating Permit, the PM10 stack testing requirements have been deleted, along with the PM10 test methods in conjunction with Condition D.1.5(b). The condition now reads as follows:
 - (b) The following PM and PM-10 testing requirement applies to the rebond molding facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 (S/V ID 28,29,35,36);

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM and ~~PM10~~ testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and ~~Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10~~, or other 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. ~~PM-10 includes filterable and condensable PM-10.~~

- 4) In Section A, Source Summary, on page 4 of 40 of the Part 70 Operating Permit, the following language has been included:

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.**

- 5) Condition B.1, (Permit No Defense) part (b), on page 6 of 40, has been changed as follows:
B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
-

(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."**

- 6) Condition B.8, (Duty to Supplement and Provide Information), part (c), on page 6 of 40, has been changed as follows:
B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
-

(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.**

- 7) Condition B.11 (Annual Compliance Certification) part (c), on page 7 of 40, has been changed as follows:
B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
-

(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 submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8) Condition B.12, (Preventive Maintenance Plan) on page 8 of 40, has been changed as follows:
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~~ **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.

9) Condition B.14 (Permit Shield), on page 10 of 40 has been changed to read as follows:
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~~ **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)]

10) Condition B.16 (Deviations from Permit Requirements and Conditions) on page 11 of 40, has been changed as follows:

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.

11) Condition B.18, (Permit Renewal), part (a) on page 12 of 40, has been changed as follows:

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) **and 326 IAC 2-7-1(40).**

- 12) Condition B.19 (Administrative Permit Amendment) on page 13 of 40, Condition B.20 (Minor Permit Modification) on page 13 of 40, and B.21 (Significant Permit Modification) on page 14 of 40, have all been combined into one condition numbered B.19 (Permit Amendment and Modification) shown below. The new B.19 condition 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)].**

- 13) Condition B.26 (now B.24) (Inspection and Entry), on page 16 of 40, has been changed as follows:

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]**

14) Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) on page 16 of 40, has been changed as follows:

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

- (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).**

15) Condition B.28 (now B.26) (Annual Fee Payment), on page 17 of 40 has been changed as follows:

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.~~

16) Condition B.28 (Credible Evidence), has been added to the end of Section B. It reads as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

17) Condition C.1 (PSD Minor Source Status), on page 18 of 40, has been changed to read as follows;

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

- (a) The total source potential to emit VOC is limited to **less than 250 249** 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 **to emit emissions** to 250 tons per **year twelve (12) consecutive month period**, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 **and 40 CFR 52.21**, before such change may occur.
- 18) Condition C.2 (Particulate matter Emission Limitations for Processes with Process Weight Rates less than One Hundred Pounds per Hour), is a new condition that has been added to the permit. The remainder of Section C has been renumbered accordingly.

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.

- 19) Condition C.6 (now C.7) (Operation of Equipment), on page 18 of 40, has been changed as follows:

C.67 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(s) vented to the control equipment is **(are)** in operation. ~~as described in Section D of this permit.~~

- 20) Condition C.7, (now C.8) (Asbestos Abatement Projects - Accreditation) on page 19 of 40, and C.12 (Asbestos Abatement Projects) on page 20 of 40, have been combined into one condition which will read as follows:

C.7.8 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.

21) Condition C.8, (now C.9) (Performance Testing), on page 19 of 40, the rule cite has been changed to 326 IAC 3-6, and the following changes have been made:

C.8-9 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ 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).

- 22) Condition C.9 (now C.10) (Compliance Monitoring) has been changed to read as follows:
C.9-10 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 **may extend compliance schedule an additional ninety (90) days provided the Permittee 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)

- 23) Condition C.11, (now C.12) (Monitoring Methods), on page 20 of 40 has been changed as follows:
C.4-12 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.

- 24) Condition C.12 (Asbestos Abatement Projects), page 20 of 40, has been deleted. It is now Condition C.8 (Asbestos Abatement Projects)

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:~~

- (4) ~~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.~~

25) Condition C.13 (Emergency Reduction Plans), on page 21 of 40, has been changed as follows:
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]

26) Condition C.14 (Risk Management Plan), on page 22 of 40, has been changed to read as follows:
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).

27) In Condition C.15 (Compliance Monitoring - Failure to Take Response Steps), on page 22 of 40, the rule cite has been changed as follows:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

28) In Condition C.16 (Actions Related to Noncompliance Demonstrated by a Stack Test), on page 23 of 40, a rule cite and new language has been added as follows:

C.16 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).

29) Condition C.17 (Emission Statement) part (a) on page 24 of 40 has been changed as follows:

C.17 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]**

- (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 **July 1** 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:

30) Condition C.19 (General Record Keeping Requirements), on page 25 of 40, has been changed as follows:

C.19 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 makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

31) Condition C.20 (General Reporting Requirements), on page 25 of 40, has been changed as follows:

C.20 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 ~~Quality~~ **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).

- 32) Section D.1 (Facility Operating Conditions) on page 28 of 40, the following rule cite has been added to the facility description box in all D sections.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- 33) Condition D.1.1 (Volatile Organic Compounds), on page 28 of 40, has been changed as follows:
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

The polyurethane foam production plant shall limit the VOC emissions from the emission units identified as the pourline (EU-PL), flame laminators #1 and #2 (EU-F1, EU-F2), four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), three (3) natural gas boilers (EU-B1,EU-B2,EU-B3) identified in Section D.2, adhesive application operations, and chemical solvent usage, such that total source-wide VOC **potential to emit emissions do not exceed 249 is less than 250** tons per twelve (12) consecutive month period.

- (1) The VOC usage at the pourline facility identified as (EU-PL) shall be limited such that VOC emissions do not exceed 164.64 tons per twelve (12) consecutive month period. Emissions shall be calculated using the following:
- (1) Emissions from TDI and MDI usage shall be equal to a 0.12 pounds VOC per hour emission rate;
- (2) VOC emissions from amine catalyst usage shall be calculated using the following equation:
- VOC emissions (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs
- (A) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturers data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.
- (b) The VOC emissions from Flame Laminator #2 (EU-F2) shall be limited to 24.0 tons per year based on the following:
- (1) This operating limit was based on a stack test emission factor of 6.5 lbs VOC per hour, and a foam burn-off range between 0.015 inches and 0.150 inches of foam. If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly to limit potential VOC emissions from EU-F2 to 24.0 tons per year.
- (c) Flame Laminator #1 (EU-F1) emissions shall be based on a VOC emission rate of 6.5 pounds per hour. If the results of the stack testing required in this permit indicates a higher VOC emission rate, that rate shall be used to determine emissions from EU-F1.
- (d) The VOC emissions from the four (4) rebond molding facilities (EU-R1,EU-R2,EU-R3, EU-R4) are based on a total emission factor of 0.14 lbs VOC/hr. This factor shall be used when calculating VOC emissions. If the results of the stack testing required in this permit indicates a higher VOC emission rate, that rate shall be used to determine emissions from the four (4) rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4).

Compliance with these conditions shall limit source-wide VOC emissions to less than ~~249~~ **250** tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21** not applicable.

- 34) Condition D.1.2 (Volatile Organic Compounds), on page 29 of 40, has been changed as follows:
D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The facility identified as Flame Laminator #2 (EU-F2) shall be limited to no more than 7,380 hours of operation per twelve (12) consecutive month period. This operating limit is required to limit the potential to emit VOC to ~~24.0 tons~~ **less than 25.0 tons per year** to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

- (a) This operating limit was based on a stack test emission factor of 6.5 lbs VOC per hour, and a foam burn-off range between 0.015 inches and 0.150 inches of foam. If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly to limit the potential to emit VOC from EU-F2 to ~~24.0 tons~~ **less than 25.0 tons per year**.

- 35) Condition D.1.5 (Testing Requirements), on page 30 of 40, has been changed as follows:
D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

1. The following VOC testing requirement applies to the following facilities:

- (i) pourline (EU-PL);
- (ii) flame laminators #1 and #2 (EU-F1, EU-F2);
- (iii) rebond molding (EU-R1, EU-R2, EU-R3, EU-R4);

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 and D.1.2, 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.**

- (b) The following PM and PM-10 testing requirement applies to the rebond molding facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 (S/V ID 28,29,35,36);

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A, or other 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.**

- 36) Condition D.1.6 (Volatile Organic Compounds), on page 30 of 40, has been changed as follows:
D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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.

- 37) Condition D.1.7 (VOC Emission), has been included in the operating permit. All following conditions are renumbered accordingly:

D.1.7 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 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.

- 38) Section D.2 (Facility Operating Conditions) on page 32 of 40, the following rule cite has been added to the facility description box.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- 39) Condition D.2.2 (Testing Requirements), on page 32 of 40, has been changed as follows:

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the Particulate Matter (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 33 of 40, the checkbox and wording for "Emergency/Deviation Occurrence Reporting Form" has been deleted.
- 2) On the Emergency/Deviation Occurrence Reporting Form, page 34 of 40, the wording "attach a signed certification to complete this report" on the bottom of the page has been deleted.
- 3) The Quarterly Compliance Report, page 40 of 40, is now called the Quarterly (or Semi-Annual) 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: 2211 South Wayne St., Auburn, IN 46706
 Mailing Address: 2211 South Wayne St., Auburn, IN 46706
 Part 70 Permit No.: T033-7625-00047:

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.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
TITLE V: T033-7625-00047
Reviewer: JM / EVP
Date: December 30, 1997

Total Potential To Emit (tons/year)

Emissions Generating Activity						
Pollutant	Pourline (1) (EU-PL)	Flame Laminators (2) (EU-F1, EU-F2)	Rebond Molding (3) (EU-R1, R2, R3, R4)	Building Fugitives (4) (adhesives, chemical solvents)	Combustion (EU-B1, EU-B2, EU-B3)	TOTAL
PM	0.00	16.00	38.54	0.00	1.90	56.4
PM10	0.00	16.00	38.54	0.00	1.90	56.4
SO2	0.00	0.01	0.00	0.00	0.08	0.1
NOx	0.00	13.97	0.00	0.00	19.32	33.3
VOC	368.42	56.94	0.61	30.82	0.38	457.2
CO	0.00	40.48	0.00	0.00	4.83	45.3
total HAPs	15768.50	128.00	0.61	28.21	0.00	15925.3
worst case single HAP	15768.00	118.70	0.61	21.90	0.00	

Total Limited Potential To Emit (tons/year)

Emissions Generating Activity						
Pollutant	Pourline (1) (EU-PL)	Flame Laminators (2) (EU-F1, EU-F2)	Rebond Molding (3) (EU-R1, R2, R3, R4)	Building Fugitives (4) (adhesives, chemical solvents)	Combustion (EU-B1, EU-B2, EU-B3)	TOTAL
PM	0.00	14.73	38.54	0.00	1.90	55.2
PM10	0.00	14.73	38.54	0.00	1.90	55.2
SO2	0.00	0.01	0.00	0.00	0.08	0.1
NOx	0.00	12.87	0.00	0.00	19.32	32.2
VOC	164.64	52.47	0.61	30.82	0.38	249.0
CO	0.00	37.29	0.00	0.00	4.83	42.1
total HAPs	7045.38	117.88	0.61	28.21	0.00	7192.1
worst case single HAP	7045.14	109.34	0.61	21.90	0.00	

For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

- (1) TDI stack testing was performed on the pourline facility (EU-PL) in May, 1990. Total limited VOC emissions from amine catalyst and TDI usage are equal to : 164.40 tons/yr + 0.24 tons/yr = 164.64 tons VOC /yr.
- (2) Potential emissions of all pollutants from Flame Laminators are based on March, 1995 stack results from a similar unit at Foamex, L.P. in Santa Teresa, New Mexico.
- (3) A PM-10 emission factor of 2.2 lbs PM-10/hr/unit for EU-R1, EU-R2, EU-R3, and EU-R4 was based on 1987 stack testing at a similar rebond molding unit at Foamex, L.P. in Corry, PA.
four (4) units x (2.2 lb/hr/unit) x 8760 hrs/yr x 1 ton/2000 lbs = 38.54 tons/yr.
- (4) Potential emissions for source-wide adhesive application and chemical solvent operations.

(See pages 2, 3, and 4 of TSD Appendix A for more detailed emissions calculations)

**Appendix A: Emission Calculations
VOC Emissions
From Foam Production Line**

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
TITLE V: T033-7625-00047
Reviewer: JM / EVP
Date: December 30, 1997

Potential Emissions:										
Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Volatile Organics	Potential Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Potential VOC pounds per hour	Potential VOC tons per year	Operational Limitations %	Limited VOC tons per year
Chemical Solvent (Building Fugitives)	8.93	100.00%	0.00%	100.00%	2.04	0.23	2.04	8.94	none	8.94
Water Based Adhesives (Building Fugitives)	10.10	43.00%	42.00%	1.00%	500.00	49.50	5.00	21.90	none	21.90
Amine Catalyst (Pourline) (1)	7.48	100.00%	0.00%	35.00%	240.00	32.09	84.00	367.92	44.68%	164.39
							91.04	30.84		195.22

Material	VOC Emission Factor (lb/hr) (2)	Potential VOC pounds per hour	Potential VOC tons per year	Operational Limitations %	Potential VOC tons per year
MDI / TDI (Pourline EU-PL)	0.12	0.12	0.50	44.68%	0.23
MDI / TDI (EU-R1,R2,R3,R4)	0.14	0.14	0.61	none	0.61
VOC (EU-F1)	6.50	6.50	28.47	none	28.47
VOC (EU-F2) (3)	6.50	6.50	28.47	84.30%	24.00
VOC (EU-B1,B2,B3)	0.09	0.09	0.39	none	0.39
		13.34	58.44		53.69

TOTAL SOURCE-WIDE VOC EMISSIONS:	104.38	89.28	- - -	249
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Note:

- (1) The pourline facility (EU-PL) shall be limited to emit 164.64 tons of VOC per year. These limits are necessary to limit source-wide VOC emissions to 249 tons/yr to avoid 326 IAC 2-2 (PSD).
 The volatile portion of the amine catalyst consists of the tertiary amine. Therefore, if the amine catalyst is comprised of 35% tertiary amine, then a 35% VOC factor shall be used to calculate VOC emissions.
 The operational limitation of 44.68% represents limits for usage and/or operating hours of a typical amine catalyst comprised of 35% tertiary amine which must be instituted to avoid 326 IAC 2-2 (PSD).
 Depending on the chemistry of the foam under production, different amine catalysts may have different percentages of tertiary amine and hence different VOC flash-off factors.
 TDI stack testing was performed on the pourline facility (EU-PL) in May, 1990. Total limited VOC emissions from amine catalyst and TDI usage are equal to : 164.40 tons/yr + 0.24 tons/yr = 164.64 tons VOC /yr.
 Source: Harrington, R.; Hock, K. "Flexible Polyurethane Foams"; Dow Chemical Company: Midland, Michigan, 1991.
- (2) Emission factors are based on the following:
 - (a) TDI / MDI stack testing performed on the pourline facility (EU-PL) in May, 1990.
 - (b) TDI/MDI stack testing performed on the four (4) rebond mold facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 September 14, 1993.
 - (c) VOC factors taken for EU-F1 and EU-F2 are based on VOC testing performed on a similar flame laminating unit at the Foamex plant in Santa Teresa, NM in March, 1995.
 - (d) Emission factors for the facilities identified as EU-B1, EU-B2 and EU-B3 taken from AP-42 (See Appendix A, page 4 of 4 for detailed emission calculations).
- (3) The flame laminating facility identified as EU-F2 shall be limited to 7,380 operating hours per year, or a number determined in the latest stack test.
 This is equivalent to an 84.3% operational limitation (7380/8760) = .843 = 84.3%. This limit is required to limit VOC emissions to 2.0 tons per month (24 tons/yr) to avoid 326 IAC 8-1-6 (BACT).

*TDI (Toluene diisocyanate) and MDI (Methylenediphenyl diisocyanate) assumed all VOC

Methodology:

Weight % Organics = Weight % Volatiles - Weight % Water

Limited VOC Tons per Year = Pounds of VOC per hour * (Operational Limitations %) * (1 ton/2000 lbs)

Potential VOC Pounds per Hour = Density (lb/gal) * Maximum Potential Gal of Material (gal/hr) * Weight % Volatile

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

**Appendix A: Emission Calculations
HAP Emissions
From Foam Production Line**

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
TITLE V: T033-7625-00047
Reviewer: JM / EVP
Date: December 30, 1997

Potential HAP Emissions:									
Material	Process Exhaust	Density (Lb/Gal)	Weight % HAPS	Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Operational Limitations %	Potential HAP pounds per hour *(1)	Potential HAPS (tons/yr)	Limited HAPS (tons/yr) (2)
Methylene Chloride	Blowing Agent (1)	11.10	100.00%	3600.00	324.32	44.68%	3600.00	15768.00	7045.14
Methylene Chloride	Chemical Solvent (Building Fugitive)	11.10	100.00%	0.94	0.08	none	0.94	4.12	4.12
Vinyl Acetate	Adhesives (Building Fugitives)	10.10	1.00%	500.00	49.50	none	5.00	21.90	21.90
Formaldehyde	Adhesives (Building Fugitives)	10.10	0.10%	500.00	49.50	none	0.50	2.19	2.19

Material	HAP Emission Factor (lb/hr) (2)	Operational Limitations %	Potential HAP pounds per hour	Potential HAP tons per year	Limited HAP tons per year
TDI / MDI (Pourline EU-PL)	0.12	44.68%	0.12	0.50	0.23
TDI / MDI (EU-R1,2,3,4)	0.14	none	0.14	0.61	0.61
TDI / MDI (EU-F1,EU-F2) (3)	0.22	92.12%	0.22	0.96	0.89
HCl (EU-F1,EU-F2)	27.10	92.12%	27.10	118.70	109.34
HF (EU-F1,EU-F2)	0.002	92.12%	0.002	0.01	0.01
HCN (EU-F1, EU-F2)	1.90	92.12%	1.90	8.32	7.67

TOTAL POTENTIAL SOURCE-WIDE HAP EMISSIONS	3635.92	15925.32	7192.09
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Note:

- (1) The pourline facility (EU-PL) shall be limited to emit 164.64 tons of VOC per year. These limits are necessary to limit source-wide VOC emissions to 249 tons/yr to avoid 326 IAC 2-2 (PSD).
The operational limitation for the pourline of 44.68% represents limits for usage and/or operating hours of a typical amine catalyst comprised of 35% tertiary amine which must be instituted to avoid 326 IAC 2-2 (PSD).
Methylene Chloride is used as a "blowing agent" and calculations are based on a 100% Methylene Chloride flash-off at the pourline (EU-PL)..
- (2) Emission factors are based on the following stack testing:
(a) TDI / MDI factors for EU-PL based on stack testing performed on the pourline facility (EU-PL) in May, 1990.
(b) TDI/MDI factors for rebond molding based on stack testing performed on the four (4) rebond mold facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 in September, 1993.
(c) Hydrochloric acid (HCl), Hydrocyanic acid (HCN), Hydrofluoric acid (HF), and Toluene diisocyanate (TDI) factors for EU-F1 and EU-F2 are based on stack testing performed on a similar flame laminating unit at the Foamex plant in Santa Teresa, NM in March, 1995. The factor was multiplied by 2 to account for both facilities (EU-F1, and EU-F2).
- (3) The flame laminating facility identified as EU-F2 shall be limited to 7,380 operating hours per year, or a number determined in the latest stack test.
This is equivalent to an 84.3% operational limitation (7380/8760) = .843 = 84.3%. This limit is required to limit VOC emissions to 2.0 tons per month (24 tons/yr) to avoid 326 IAC 8-1-6 (BACT).
The total material throughput for the two (2) facilities is equivalent to (7380 hrs+ 8760 hrs = 16,140 hrs/yr).
This is equivalent to 92.12 % of the total operating hours of the two facilities [7380 hrs/yr + 8760 hrs/yr / 8760 hrs/yr *2] = .9212; = 92.12%.

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)

Limited HAP Tons per Year = Pounds of HAP per hour * (Operational Limitations) * (1 ton/2000 lbs)

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

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

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
TITLE V: T033-7625-00047
Reviewer: JM / EVP
Date: December 30, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

31.5

275.9

Heat Input Capacity includes:
 Three Industrial Boilers, each rated at 10.5 MMBtu per hour: (EU-B1, EU-B2, EU-B3)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.9	1.9	0.1	19.3	0.4	4.8

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx burner = 83, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 34

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

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

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