



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

January 29, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant  
RE: Syndicate Sales, Inc. / F067-7701-00053  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 8/11/03



Joseph E. Kernan  
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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Syndicate Sales, Inc.  
945 South Lindsay Street  
Kokomo, Indiana 46903**

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

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

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

Operation Permit No.: F067-7701-00053	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 29, 2004  Expiration Date: January 29, 2009

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary foam production, forming and packaging operation.

Authorized individual:	President/COO
Source Address:	945 South Lindsay Street, Kokomo, Indiana 46903
Mailing Address:	P.O. Box 756, Kokomo, Indiana 46903-0756
General Source Phone:	765-457-7277
SIC Code:	3086
Source Location Status:	Howard County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

- (1) one (1) Foam Production Line, using a maximum of 354 pounds per hour of blowing agent, consisting of:
  - (a) one (1) mixer/dispenser;
  - (b) one (1) conveyORIZED foam curing oven and one (1) normalizing tunnel, both controlled by one (1) recuperative thermal incinerator, and both exhausting through one (1) stack (ID No. Vent 1);
  - (c) one (1) bun saw, controlled by one (1) baghouse (ID No. DC-1); and
  - (d) one (1) foam bun storage warehouse.
  
- (2) one (1) Form & Package Line consisting of:
  - (a) one (1) horizontal slab saw, controlled by one (1) baghouse (ID No. DC-2);
  - (b) one (1) edge trim saw, controlled by one (1) baghouse (ID No. DC-3);
  - (c) one (1) logo press;
  - (d) one (1) waterjet cutter; and
  - (e) one (1) automatic packager.

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

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This stationary source also includes 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 including:

- (a) thirty two (32) natural gas fired burners, each rated at 0.135 million (MM) British thermal units (Btu) per hour;
- (2) one (1) phenolic resin bulk tank, with a maximum storage capacity of 10,000 gallons;
- (3) one (1) phenol sulfonic acid bulk tank, with a maximum storage capacity of 6,000 gallons;
- (4) two (2) blowing agent bulk tanks, each with a maximum storage capacity of 3,000 gallons;
- (5) one (1) blowing agent batch tank, with a maximum storage capacity of 1,016 gallons;
- (6) combustion source flame safety purging on startup;
- (7) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (8) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (9) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (10) closed loop heating and cooling systems;
- (11) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
- (12) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (13) heat exchanger cleaning and repair;
- (14) process vessel degassing and cleaning to prepare for internal repairs;
- (15) 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;
- (16) paved and unpaved roads and parking lots with public access;
- (17) asbestos abatement projects regulated by 326 IAC 14-10;
- (18) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (19) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower; and
- (20) a laboratory as defined in 326 IAC 2-7-2(20)(C).

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

## **SECTION B                    GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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

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

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

### **B.3      Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

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

### **B.4      Enforceability [326 IAC 2-8-6]**

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

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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

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

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

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9      Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

#### B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
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 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (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, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ 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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the 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 Quality  
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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1][IC 13-17-3-2]

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

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

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

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

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

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, 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, Subpart M]

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality  
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 protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

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

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

#### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, Office of Air Quality  
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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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 2-8-4(10)]:

- (1) one (1) Foam Production Line, using a maximum of 354 pounds per hour of blowing agent, consisting of:
  - (a) one (1) mixer/dispenser;
  - (b) one (1) conveyORIZED foam curing oven and one (1) normalizing tunnel, both controlled by one (1) recuperative thermal incinerator, and both exhausting through one (1) stack (ID No. Vent 1);
  - (c) one (1) bun saw, controlled by one (1) baghouse (ID No. DC-1); and
  - (d) one (1) foam bun storage warehouse.

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

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

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

- (a) Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the following has been determined to be BACT for the Foam Production Line:

- (1) Total VOC usage in the Foam Production Line shall not exceed 152.3 tons per 12 consecutive month period, with compliance determined at the end of each month. This is equivalent to limited VOC emissions of 98.9 tons per year based on 59% of the emissions being emitted uncontrolled from the warehouse and 41% of the emissions being emitted from the oven/normalizing tunnel which is controlled by the recuperative thermal incinerator with a minimum 90% capture efficiency and a minimum 95% destruction efficiency;
- (2) continuing use of the existing recuperative thermal incinerator on the oven/normalizing tunnel at all times that the oven/normalizing tunnel is in operation; and
- (3) no add-on controls for the warehouse.

When operating, the recuperative thermal incinerator controlling the oven and normalizing tunnel shall maintain a minimum operating temperature of 1,400° F to maintain a minimum 95% destruction of the volatile organic compound (VOC) captured.

- (b) These limitations will also satisfy the requirements of 326 IAC 2-8 and will render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the bun saw shall not exceed 8.7 pounds per hour when operating at a process weight rate of 6,140 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

D.1.3 Particulate Matter 10 Microns [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the bun saw shall not exceed 8.7 pounds per hour including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. These limitations will also render 326 IAC 2-2 not applicable.

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

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

**Compliance Determination Requirements**

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.1.1 for the recuperative thermal incinerator utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.6 Thermal Incinerator Temperature and Operation

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the recuperative thermal incinerator for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal incinerator at or above the hourly average temperature of 1400 °F.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal incinerator at or above the hourly average temperature as observed during the compliant stack test.
- (d) A time clock shall be installed, maintained and operated on the recuperative thermal oxidizer to indicate that the recuperative thermal oxidizer is in operation at all times that the foam curing oven and normalizing tunnel are operating.

D.1.7 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal incinerator is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.8 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

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

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Condition 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 the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of the blowing agent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used on a monthly basis;
  - (2) The total VOC usage for each month;
  - (3) The weight of VOCs emitted for each compliance period;
  - (4) The continuous temperature records (on an hourly average basis) for the thermal incinerator and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test;
  - (5) Records of the recuperative thermal incinerator operating time; and
  - (6) Daily records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (2) one (1) Form & Package Line consisting of:
- (a) one (1) horizontal slab saw, controlled by one (1) baghouse (ID No. DC-2);
  - (b) one (1) edge trim saw, controlled by one (1) baghouse (ID No. DC-3);
  - (c) one (1) logo press;
  - (d) one (1) waterjet cutter; and
  - (e) one (1) automatic packager.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the horizontal slab saw and the edge trim saw shall not exceed 1.78 and 1.72 pounds per hour, respectively, when operating at process weight rates of 580 and 540 pounds per hour, respectively.

The pounds per hour limitations were calculated with the following equation:

Interpolation 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.2.2 Particulate Matter 10 Microns [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, total particulate matter 10 microns emissions from the horizontal slab saw and the edge trim saw shall not exceed 13.87 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after issuance of this FESOP, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM-10 testing for the horizontal slab saw and baghouse 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.2.5 Particulate Control

In order to comply with conditions D.2.1 and D.2.2, each of the baghouses for particulate control shall be in operation and control emissions from the horizontal slab saw and the edge trim saw at all times that the horizontal slab saw and the edge trim saw are in operation.

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

### **D.2.6 Visible Emissions Notations**

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- (a) Once per shift visible emission notations of the baghouse stack exhausts (DC-2 and DC-3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

### **D.2.7 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across each of the baghouses identified as DC-2 and DC-3, used in conjunction with the horizontal slab saw and the edge trim saw, respectively, at least once per shift when the horizontal slab saw and the edge trim saw are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse identified as DC-2 is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, or the pressure drop across the baghouse identified as DC-3 is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

### **D.2.8 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the horizontal slab saw and the edge trim saw when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

### **D.2.9 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.2.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per shift visible emission notations of each of the baghouse stack exhausts (DC-2 and DC-3).
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following for each baghouse:
  - (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

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

Source Name: Syndicate Sales, Inc.  
Source Address: 945 South Lindsay Street, Kokomo, Indiana 46903  
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756  
FESOP No.: F067-7701-00053

**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 Affidavit (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 QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

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

Source Name: Syndicate Sales, Inc.  
Source Address: 945 South Lindsay Street, Kokomo, Indiana 46903  
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756  
FESOP No.: F067-7701-00053

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Syndicate Sales, Inc.  
 Source Address: 945 South Lindsay Street, Kokomo, Indiana 46903  
 Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756  
 FESOP No.: F067-7701-00053  
 Facility: Foam Production Line  
 Parameter: VOC Usage  
 Limit: Total VOC usage in the Foam Production Line shall not exceed 152.3 tons per 12 consecutive month period, with compliance determined at the end of each month. This is equivalent to limited VOC emissions of 98.9 tons per year based on 59% of the emissions being emitted uncontrolled from the warehouse and 41% of the emissions being emitted from the oven/normalizing tunnel which is controlled by the recuperative thermal incinerator with a minimum 90% capture efficiency and a minimum 95% destruction efficiency;

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (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: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Syndicate Sales, Inc.  
 Source Address: 945 South Lindsay Street, Kokomo, Indiana 46903  
 Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756  
 FESOP No.: F067-7701-00053

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

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

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating  
Permit (FESOP)

**Source Name:** Syndicate Sales, Inc.  
**Source Location:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**County:** Howard  
**SIC Code:** 3086  
**Operation Permit No.:** F067-7701-00053  
**Permit Reviewer:** Trish Earls/EVP

On February 5, 2003, the Office of Air Quality (OAQ) had a notice published in the Kokomo Tribune, Kokomo, Indiana, stating that Syndicate Sales, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary foam production, forming, and packaging operation. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

On March 6, 2003, Syndicate Sales, Inc. requested additional time to review the draft permit to allow their newly hired consultant to review the draft and submit comments. On May 19, 2003, Eugene Paik of Cornerstone Environmental, Health and Safety, Inc., submitted comments on behalf of Syndicate Sales, Inc. The summary of the comments and responses is as follows:

**Comment #1**

In condition A.1, please remove Mr. Paul E. Manning's name as he is no longer with Syndicate Sales. Please change the Authorized Individual to simply the title of "President/COO". We understand that it is acceptable to IDEM to list simply a position/title when the Permittee may experience turnover in a position during the life of the permit.

**Response #1**

Section A.1 of the FESOP is revised as follows:

**A.1 General Information [326 IAC 2-8-3(b)]**

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The Permittee owns and operates a stationary foam production, forming and packaging operation.

**Authorized individual:** ~~Paul E. Manning, Vice President of Manufacturing~~  
**President/COO**  
**Source Address:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**Mailing Address:** P.O. Box 756, Kokomo, Indiana 46903-0756  
**General Source Phone:** 765-457-7277  
**SIC Code:** 3086  
**Source Location Status:** Howard County  
 Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

## **Comment #2**

In condition D.1.1, we request that the VOC BACT determination pursuant to 326 IAC 8-1-6 for the Foam Production Line be revised to a limit of 95 tons VOC usage/emissions per 12-consecutive month period instead of the conditions proposed in this draft permit of a limit of 152.3 tons per year (TPY) and operation of the recuperative thermal incinerator/oxidizer.

In a new BACT analysis included with its FESOP application, Syndicate Sales proposed revising its original 1994 BACT determination to an annual VOC limit of only 39 TPY and eliminating the requirement for the incinerator. Syndicate Sales later realized this initial limit proposal was too low and so withdrew the request. In 2002, Syndicate Sales used 49 tons of blowing agent, which is 100% VOC and 100% emitted. So instead of 39 TPY, Syndicate Sales now requests a limit of 95 TPY VOC usage/emissions, which allows for reasonable annual growth in production and blowing agent usage for the 5-year life of the permit.

Except for the 39 TPY limit request that was withdrawn, the rest of the information in the BACT analysis submitted as part of the FESOP application is still germane. Newer information is now also available. For instance, in the BACT analysis it was stated that the limiting factor in foam production is cutting foam buns to size. Actually, bun sawing is just one limiting factor. The main bottle-neck in foam production is the capability of the batching process/machine.

Batching or compounding comprises adding ingredients, adjusting temperature with each addition, and stirring. It requires 16 hours to compound the foam batch for a production run that lasts 7.5 hours. Alternately stated, Syndicate Sales can currently only dispense foam for 7.5 hours per day at maximum. To increase foam production capacity will require increasing batching capacity, and then also increasing bun normalizing space, warehouse space, and cutting, sawing and packaging capacity. Absent such changes, which would require permit revisions, the 95 TPY limit is a realistic estimate of the source's PTE.

A smaller change requires revisions to the Technical Support Document. Syndicate Sales stated in its FESOP application that only 41 % of the blowing agent is emitted while foam is in the curing oven and the normalizing tunnel. The remaining 59% is emitted in the warehouse. Since 1996, Syndicate Sales has kept the overhead door to the room containing the foam dispenser/extruder, curing oven, and normalizing tunnel closed until the foam has normalized and moved to the warehouse. Therefore, the percentages of emissions in each location have very likely changed, but no testing has been done-or is needed-to determine the new ratio of emissions by location.

Something stated in the 1996 BACT analysis must be stressed, that operating costs of the oxidizer are much greater than originally estimated in 1994. Syndicate Sales has had to burn natural gas as the primary fuel in the oxidizer because the VOC in the inlet is too low to sustain combustion on its own. The past 2 years Syndicate Sales has spent about \$50,000 per year on natural gas for just the oxidizer. Electricity for the oxidizer and boost fans and maintenance on the system are additional significant operating costs that were included in the original BACT analysis.

All of these facts suggest that the conclusion to impose the oxidizer as 8-1-6 BACT was incorrect from the beginning because it was based on inaccurate information or inappropriate conclusions drawn from the information provided during the original 1994 permitting. Specifically, we submit it was not correct in this case to scale up the hourly maximum resin and blowing agent usages to 8760 hours of operation to derive potential annual usage. We have shown that the process and materials usage is and undoubtedly always was bottle-necked to a maximum of 7.5 hours of operation. Potential calculations should have been based on a much lower number of hours of operation. Actual materials usage bears this out.

The original permit limited resin usage to 10,214 TPY; Syndicate Sales processed 961 tons resin in 2002. Potential VOC emissions from the Foam Production Line were calculated to be 1550.5 TPY; in 2002, Syndicate Sales used only 49 tons blowing agent, the source of VOC emissions. These huge differences between actual and past calculated potential usages and emissions are because it was not realized that Syndicate Sales is not physically able to operate and emit all 8760 hours of the year as discussed previously.

The main effect of this mistake was to underestimate significantly the cost-effectiveness value in dollars per ton of VOC emissions controlled. This made it seem reasonable to impose add-on control as the 8-1-6 BACT, when in fact it was overly burdensome. That this was a mistaken conclusion is supported by viewing the permit terms for Syndicate Sales's largest competitor operating in Ohio.

Smithers-Oasis in Kent, Ohio produces the same kind of floral foam via an identical process and at almost the same capacity. Both Syndicate Sales and Smithers-Oasis installed their processes in the early 1990s, and Ohio has a stringent rule requiring Best Available Technology (BAT) for VOCs in the same vein as Indiana's 326 IAC 8-1-6. VOC BAT for Smithers-Oasis's foam production line was determined to be an emission limit. No add-on control was required.

We discovered these facts from a review of Smithers-Oasis's Title V permit which was issued May 27, 1999 and a discussion of their permitting history with the Ohio agency staff person familiar with Smithers-Oasis. We have filed an information request for the past permitting documents detailing Ohio's determination of BAT for this source and will provide it as soon as it is received. The Ohio agency staff person is available for reference in this matter as well. We are also trying to determine the control requirements, if any, for another of Syndicate Sales's major competitors.

IDEM has suggested that the ability to afford installation cost is no longer relevant in a new cost-effectiveness analysis since the capital cost to install the oxidizer has already been borne. We still submit that the capital cost was Syndicate Sales's alone to bear in their industry, at least compared to their industry competitors not located in ozone non-attainment areas. It is true that the capital cost has been amortized now over close to 10 years, but it along with the ongoing operating costs are still costs that have put them at a competitive disadvantage these past 9 years.

This new permit is an opportunity to rectify a past mistake and restore Syndicate Sales to a level playing field. One feels compelled to ask how many other sources in Indiana in any industry with no other applicable requirements requiring VOC add-on control and not in a ozone non-attainment area, have been or would today be required to control actual emissions of 50 tons VOC? We submit this new request for a 95 TPY VOC usage/emissions limit for the Foam Production Line as a fairer and reasonable 8-1-6 BACT.

On a last note, a significant miscommunication appears to have occurred regarding this permit. On January 14, 2003, Syndicate Sales sent you a letter stating they recall their request for permission not to operate the oxidizer, and that is not the case. Apparently, several years ago a machine operator/technician who did not have authorization commented to an IDEM inspector that they wished they could stop operating the oxidizer, and IDEM seems to have treated this as an official request.

Syndicate Sales sent you the recent letter to emphasize that regardless of what someone at the plant may have asked, the oxidizer has been and continues to be operated in compliance with their existing operating permit. However, the request to revise the original 8-1-6 BACT to eliminate the requirement for a control device, which was made first in the 1996 FESOP application and repeated in these comments, is still very much intact.

### **Response #2**

In order to revise the existing BACT determination, a new BACT analysis would have to be submitted by Syndicate Sales to justify removal of the thermal oxidizer. However, one of the control options that would have to be considered is the continued use of the existing thermal oxidizer. Since the source has already installed the control, which has been in operation since 1994, the capital cost for installing the existing thermal oxidizer could not be considered in calculating the dollar per ton cost of using the existing thermal oxidizer as BACT. Therefore, it is unlikely that a new BACT analysis would be able to justify the removal of the thermal oxidizer for economic reasons. Since a new BACT analysis has not been submitted, justifying the removal of the requirement to operate the thermal oxidizer, there have been no changes made to the permit as a result of this comment.

### **Comment #3**

In Condition D.2.4, we request IDEM remove the proposed requirement to perform PM and PM-10 testing for the horizontal slab saw and baghouse. Given that baghouse filter efficiencies are well-known, and IDEM has accepted bag house and filter manufacturer's specifications of efficiencies in lieu of site-specific testing, this testing is an unnecessary and therefore excessive proposal. IDEM has also proposed extensive ongoing compliance monitoring to assure proper operation of the saw and its baghouse to maintain emissions at their minimum. These ongoing compliance assurance conditions coupled with the manufacturer's specification of filter efficiency and performance have been suitable for many permitted sources so far, and should be suitable for Syndicate Sales as well.

### **Response #3**

An initial compliance stack test is required for the horizontal slab saw and its associated baghouse because this unit emits a substantial portion of the potential source-wide PM-10 emissions and the baghouse must be used to comply with the PM-10 emission limit in condition D.2.2 to comply with 326 IAC 2-8 (FESOP). Therefore, it is critical that the baghouse be verified to operate according to the manufacturer's specifications and with the minimum required control efficiency for compliance. Although there are also several compliance monitoring requirements for this baghouse to demonstrate ongoing compliance, initial testing must be performed to verify the optimal pressure drop range that the baghouse should be operated at to achieve compliance. No changes have been made to condition D.2.4 as a result of this comment.

#### **Comment #4**

In Condition D.2.6. we request the frequency of visible emissions observations proposed and mentioned elsewhere in the permit be reduced to "daily." A daily frequency is all that is necessary; the operations being controlled do not vary from shift to shift. IDEM has not required per shift frequencies in other similar permits. Moreover, such monitoring is impossible to perform during night-time shifts, recognition of which is implied by the additional proposed requirement to perform the notations during normal daylight operations. Once-per-day observations coupled with the parametric monitoring requirement of Condition D.2.7 will suffice to assure ongoing compliance.

#### **Response #4**

Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Baghouse failure can occur suddenly; therefore visible emissions notations and monitoring of baghouse operational parameters should be performed more frequently than daily in such cases where a source operates more than one shift per day. The required frequency of compliance monitoring is once per shift in order to demonstrate continuous compliance unless specified otherwise by an applicable rule. The OAQ believes that visible emissions notations once per operating shift are a reasonable requirement.

Further, while the nature of a facility's operation may not vary from shift to shift, the personnel at the facility does change from shift to shift. The OAQ believes that all shifts should be in tune with the work practices necessary to ensure continual compliance with permit requirements. The OAQ believes that these work practices should include an understanding and awareness of plant emissions during normal operations. This knowledge and awareness during all shifts can minimize lag time in addressing control failure. Therefore, no changes have been made to condition D.2.6 as a result of this comment.

#### **Comment #5**

Finally, in Condition D.2.7, we also request that the static pressure drop monitoring frequency proposed be reduced to daily for reasons similar to those stated above.

#### **Response #5**

As stated in Response #4 above, compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Monitoring of baghouse operational parameters should be more frequently than daily in such cases where a source operates more than one shift per day because baghouse failure can occur suddenly. The OAQ believes that pressure drop readings once per operating shift are a reasonable requirement. No changes have been made as a result of this comment.

#### **Comment #6**

After allowing Syndicate Sales additional time to consider their course of action regarding the BACT determination on the Foam Production Line, Joseph VanCamp of Cornerstone Environmental, Health and Safety, Inc. submitted the following comment on behalf of Syndicate Sales:

“On behalf of Syndicate Sales, Cornerstone Environmental would like to request that the draft FESOP currently proposed for the Syndicate Sales facility on South Lindsay Street be finalized and issued by your agency at this time. Our earlier request dated May 16, 2003 concerning the removal of this facility’s recuperative thermal incinerator/oxidizer should be disregarded as Syndicate Sales has agreed to continue operating this control device to comply with the state BACT rules in 326 IAC 8-1-6. All other comments aside from the request to revise the original BACT determination that were presented in the May 16<sup>th</sup> letter are still considered valid and should be addressed in the final FESOP issued.”

### **Response #6**

Since the source has withdrawn their request to remove the requirement to operate the thermal oxidizer pursuant to 326 IAC 8-1-6, the existing BACT determination for the Foam Production Line will remain unchanged in the permit.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The following updates have been made to the table of contents in order to be complete, clear, and correct.

- A.5 Prior Permits Superseded **[326 IAC 2-1.1-9.5]**
- B.3 Permit Term [326 IAC 2-8-4(2)]**[326 IAC 2-1.1-9.5]**
- B.~~4~~**15** Permit Modification, Reopening, Revocation and Reissuance, or Termination **[326 IAC 2-8-4(5)(C)]****[326 IAC 2-8-7(a)]****[326 IAC 2-8-8]**
- B.~~4~~**18** Operational Flexibility [326 IAC 2-8-15]**[326 IAC 2-8-11.1]**
- B.~~2~~**21** Transfer of Ownership or Operational **Control** [326 IAC 2-8-10]
- C.1 Particulate Emission Limitations **For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P]****[326 IAC 6-3-2]**
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] **[326 IAC 2-8-4(3)]****[326 IAC 2-8-5(1)]**
- C.15 Compliance Response Plan -Preparation, Implementation, Records, and Reports **[326 IAC 2-8-4]****[326 IAC 2-8-5]**
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-8-4]** **[326 IAC 2-8-5]**

2. OAQ has decided to move the provision that is required by 326 IAC 2-8-4(5) from condition B.10 to the front of the permit. Therefore, condition B.10 has been deleted and the requirements of that condition have been added to the front page of the permit.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; and~~

~~(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.~~

~~(c) — An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.~~

3. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, paragraph (a) has been removed from condition B.8, Duty to Supplement and Provide Information.

B.8 ~~Duty to Supplement and Provide Information—[326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]~~  
~~[326 IAC 2-8-5(a)(4)]~~

~~(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 Quality  
\_\_\_\_\_ 100 North Senate Avenue, P.O. Box 6015  
\_\_\_\_\_ Indianapolis, Indiana 46206-6015~~

~~\_\_\_\_\_ The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

~~(b)(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.~~

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

4. Condition B.13 (b), now B.12(b), Preventive Maintenance Plan, was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to the D Sections. Because the general record keeping requirements (i.e. retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

**B.132 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

5. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, paragraph (d) has been added to B.18, now B.17, Permit Amendment or Revision.

**B.187 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-10(b)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

6. For clarity, additional rule cites have been added to B.21, now B.20, Inspection and Entry.

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

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

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

7. The following change has been made to C.1, Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

**C.1** Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, ~~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.

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

8. C.8, Asbestos Abatement Projects, has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
**The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).**
- (f)(g) **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, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.**

9. C.9(c), Performance Testing, has been revised so that "source" is changed to "Permittee".

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality  
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 protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

10. C.14, Risk Management Plan, has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

~~If a regulated substance, subject to as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the Permittee must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual 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~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

11. Failure to take reasonable response steps shall be considered deviation of the permit; therefore, C.15(b)(4), Compliance Response Plan - Preparation, Implementation, Records, and Reports, was revised. Also, the notification requirement in (b)(3) has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
    - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
    - (4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.
  - (c) The Permittee is not required to take any further response steps for any of the following reasons:
    - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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.
    - (3) An automatic measurement was taken when the process was not operating.
    - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
  - (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
  - (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
  - (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
12. In order to clarify which documents need to be certified by an authorized individual, the following update has been made:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

13. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be **kept physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

14. C.18(a), General Reporting Requirements, has been revised so that “source” is changed to “Permittee”.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

15. Language was added to the recordkeeping condition D.1.9 to clarify that the Permittee has 30 days to demonstrate compliance with the limit. Also, a requirement has been added to conditions D.1.9 and D.2.10 to require records to be maintained since the requirement has been removed from B.13, now B.12.

#### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition 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 the VOC emission limits established in Condition D.1.1. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The amount and VOC content of the blowing agent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used on a monthly basis;
  - (2) The total VOC usage for each month;
  - (3) The weight of VOCs emitted for each compliance period;
  - (4) The continuous temperature records (on an hourly average basis) for the thermal incinerator and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test;
  - (5) Records of the recuperative thermal incinerator operating time; and
  - (6) Daily records of the duct pressure or fan amperage.
- (b) **To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (b)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per shift visible emission notations of each of the baghouse stack exhausts (DC-2 and DC-3).
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following for each baghouse:
- (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) **To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**

(d)(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

16. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, is considered a deviation from the permit, not a violation of the permit. Therefore, conditions D.2.6 and D.2.7 have been revised as follows:

#### D.2.6 Visible Emissions Notations

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- (a) Once per shift visible emission notations of the baghouse stack exhausts (DC-2 and DC-3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

#### D.2.7 Parametric Monitoring

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The Permittee shall record the total static pressure drop across each of the baghouses identified as DC-2 and DC-3, used in conjunction with the horizontal slab saw and the edge trim saw, respectively, at least once per shift when the horizontal slab saw and the edge trim saw are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse identified as DC-2 is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, or the pressure drop across the baghouse identified as DC-3 is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

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

17. The quarterly inspection do not need to be conducted in the last month of the quarter, but they should not occur in consecutive months. Therefore, condition D.2.8 has been revised as follows:

#### D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the horizontal slab saw and the edge trim saw when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. **Inspections required by this condition shall not be performed in consecutive months.** All defective bags shall be replaced.

18. The OAQ has decided that rather than require an emission unit to automatically shutdown when a broken bag occurs that causes visible emissions, the OAQ would instead require the Permittee to notify the OAQ if they determine the broken bag will not be fixed within 10 days. The notification would tell the OAQ when they expect to fix the problems. Once OAQ receives the notification, a decision can be made whether to require the source to do a stack test. Therefore, condition D.2.9 has been revised as follows:

#### D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).~~ Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a ~~violation of~~ **deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

#### Source Background and Description

**Source Name:** Syndicate Sales, Inc.  
**Source Location:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**County:** Howard  
**SIC Code:** 3086  
**Operation Permit No.:** F067-7701-00053  
**Permit Reviewer:** Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Syndicate Sales, Inc. relating to the operation of a stationary foam production, forming and packaging operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) Foam Production Line, using a maximum of 354 pounds per hour of blowing agent, consisting of:
  - (a) one (1) mixer/dispenser;
  - (b) one (1) conveyORIZED foam curing oven and one (1) normalizing tunnel, both controlled by one (1) recuperative thermal incinerator, and both exhausting through one (1) stack (ID No. Vent 1);
  - (c) one (1) bun saw, controlled by one (1) baghouse (ID No. DC-1); and
  - (d) one (1) foam bun storage warehouse.
- (2) one (1) Form & Package Line consisting of:
  - (a) one (1) horizontal slab saw, controlled by one (1) baghouse (ID No. DC-2);
  - (b) one (1) edge trim saw, controlled by one (1) baghouse (ID No. DC-3);
  - (c) one (1) logo press;
  - (d) one (1) waterjet cutter; and
  - (e) one (1) automatic packager.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:
  - (a) thirty two (32) natural gas fired burners, each rated at 0.135 million (MM) British thermal units (Btu) per hour;
- (2) one (1) phenolic resin bulk tank, with a maximum storage capacity of 10,000 gallons;
- (3) one (1) phenol sulfonic acid bulk tank, with a maximum storage capacity of 6,000 gallons;

- (4) two (2) blowing agent bulk tanks, each with a maximum storage capacity of 3,000 gallons;
- (5) one (1) blowing agent batch tank, with a maximum storage capacity of 1,016 gallons;
- (6) combustion source flame safety purging on startup;
- (7) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (8) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (9) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (10) closed loop heating and cooling systems;
- (11) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
- (12) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (13) heat exchanger cleaning and repair;
- (14) process vessel degassing and cleaning to prepare for internal repairs;
- (15) 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;
- (16) paved and unpaved roads and parking lots with public access;
- (17) asbestos abatement projects regulated by 326 IAC 14-10;
- (18) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (19) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower; and
- (20) a laboratory as defined in 326 IAC 2-7-2(20)(C).

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP 067-3136-00053, issued on February 4, 1994.

All conditions from previous approvals were incorporated into this FESOP.

### Enforcement Issue

This source submitted a FESOP application on December 13, 1996. However, since this source was in existence on December 14, 1995, the source should have submitted the application so that a FESOP could have been issued by December 14, 1996 as required in 326 IAC 2-8-2.

Therefore, since the source did not obtain a final FESOP by December 14, 1996, a referral to enforcement is being included with this draft permit.

### Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on September 26, 1997.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (4 pages).

**Potential To Emit for the Source**

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential Emissions (tons/year)
PM	178.32
PM-10	178.32
SO <sub>2</sub>	0.01
VOC	1,550.62
CO	0.76
NO <sub>x</sub>	1.78

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)
TOTAL	0.0

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (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.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Foam Production Line <sup>(1)</sup>	38.11	38.11	0.00	98.90	0.00	0.00	0.00
Form & Package Line <sup>(2)</sup>	15.32	60.75	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.14	0.14	0.01	0.10	0.76	1.78	0.00
<b>Total Emissions</b>	<b>53.57</b>	<b>99.00</b>	<b>0.01</b>	<b>99.00</b>	<b>0.76</b>	<b>1.78</b>	<b>0.00</b>

- Notes: (1) PM and PM10 emissions are equivalent to the maximum allowable particulate emissions pursuant to 326 IAC 6-3-2.  
 (2) PM emissions are equal to the maximum allowable particulate emissions pursuant to 326 IAC 6-3-2. Allowable PM-10 emissions are required to limit source-wide PM-10 emissions to less than 100 tons per year to comply with 326 IAC 2-8 (FESOP).

**County Attainment Status**

The source is located in Howard County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

**Federal Rule Applicability**

- (a) The 10,000 gallon phenolic resin bulk tank, the 6,000 gallon phenol sulfonic acid bulk tank, the two (2) 3,000 gallon blowing agent bulk tanks, and the 1,016 gallon blowing agent batch tank, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb), because each of the tanks has a storage capacity less than 40 cubic meters (10,568 gallons).
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, applicable to this source.
- (c) This source is not subject to 40 CFR Part 63, Subpart III, "National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Manufacturing". This rule applies to each new and existing process that produces flexible polyurethane foam or rebond foam, that emits a HAP and is located at a plant that is a major source for HAPs. The foam production process at this source uses non-HAP blowing agents and does not emit any HAPs. Therefore, since the foam production process does not emit a HAP and

the source is not a major source of HAPs, this rule does not apply.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source is not subject to the requirements of this rule. As shown in the Potential to Emit After Issuance table on page 4 above, the allowable emissions of all regulated pollutants are less than 250 tons per year after application of all federally enforceable emission limits. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

#### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of particulate matter and volatile organic compounds to below 100 tons per year per pollutant. Therefore, the requirements of 326 IAC 2-6 do not apply.

#### **326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, source wide VOC emissions must be limited to less than 100 tons per year. The source has accepted a VOC usage limitation for the Foam Production Line so that VOC emissions are limited to 98.9 tons per 12 consecutive month period, with compliance determined at the end of each month. By accepting this VOC usage limitation for the Foam Production Line, source wide VOC emissions are limited to 99.0 tons per 12 consecutive month period, thus the source satisfies the requirements of 326 IAC 2-8-4 and the requirements of 326 IAC 2-7 do not apply. Additionally, PM-10 emissions from the bun saw in the Foam Production Line shall be limited to 8.7 pounds per hour and total PM-10 emissions from the horizontal slab saw and the edge trim saw in the Form & Package Line shall be limited to 13.87 pounds per hour. The source will comply with the PM-10 emission limits by utilizing a baghouse for controlling PM-10 emissions from the bun saw, and utilizing two (2) baghouses for controlling PM-10 emissions from each of the horizontal slab saw and edge trim saw. Therefore, the requirements of 326 IAC 2-7 do not apply. These limitations will also render 326 IAC 2-2 (PSD) not applicable.

#### **326 IAC 5-1 (Opacity Limitations)**

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

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

#### **326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

### State Rule Applicability - Individual Facilities

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

The operation of the Foam Production Line and the Form & Package Line will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate emissions from the bun saw in the Foam Production Line shall not exceed 8.7 pounds per hour, particulate emissions from the horizontal slab saw in the Form & Package Line shall be limited to 1.8 pounds per hour, and particulate emissions from the edge trim saw in the Form & Package Line shall be limited to 1.7 pounds per hour (see Appendix A: Emission Calculations, page 3 of 4) based on the following equation:

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

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

The source will comply with the requirements under 326 IAC 6-3-2 by utilizing a baghouse for controlling particulate emissions from the bun saw at all times when the bun saw is in operation, and utilizing two (2) baghouses for controlling particulate emissions from the horizontal slab saw and edge trim saw at all times these units are in operation. These limitations will also render 326 IAC 2-2 not applicable.

#### 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The Foam Production Line is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the Foam Production Line are 1,550.5 tons per year. Since the potential VOC emissions are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 apply to the Foam Production Line. Syndicate Sales, Inc. originally submitted a BACT analysis, as required pursuant to 326 IAC 8-1-6, as part of the construction permit application process.

The original construction permit BACT analysis submitted by Syndicate Sales, Inc. only considered applying controls to the oven and normalizing tunnel of the Foam Production Line and concluded that use of a recuperative thermal incinerator is BACT for the oven and normalizing tunnel of the Foam Production Line. It did not consider applying controls to the warehouse product storage area. This was because pre-construction laboratory tests predicted that 100% of the VOC in the foam product would be emitted by diffusion prior to the product being sent to the warehouse. However, compliance tests have demonstrated that only 41% of the VOC is emitted in the Foam Production Line, with the remaining 59% being emitted in the warehouse.

Syndicate Sales, Inc. has now submitted a revised BACT analysis, dated October 24, 1996, as part of this FESOP application. The revised BACT analysis contains an evaluation of new control options for the warehouse for the Foam Production Line. The source will continue to use the existing recuperative thermal incinerator as BACT for the oven and normalizing tunnel of the Foam Production Line.

The options considered in the BACT analysis for the warehouse are:

- (1) Recuperative Thermal Incineration

- (2) Regenerative Thermal Incineration
- (3) Recuperative Catalytic Incineration
- (4) Regenerative Catalytic Incineration
- (5) Flare
- (6) Other Innovative Destruction Technologies
- (7) Carbon Adsorption
- (8) Absorption
- (9) Condensation
- (10) Carbon Adsorption with Recuperative Thermal Incineration
- (11) Absorption and Incineration

It was determined that options 5 through 11 are technically infeasible due to the following reasons:

- (5) Flare systems require a large amount of supplemental fuel when used to control dilute emission streams. The VOC content of the warehouse emission stream is about 11 ppmv. Since the emission stream is so dilute, the flare would basically be operating solely on the supplemental fuel.
- (6) None of the innovative destruction technologies such as biofilters or systems applying ultraviolet radiation seem well documented, in particular, process cost information is lacking. These options were not considered to be commercially available.
- (7) Carbon adsorption is an equilibrium process, driven by a concentration gradient between the emission stream and the adsorption media. If the concentration of the emission stream is low, it decreases the concentration gradient, and the control efficiency drops drastically. The emission stream from the warehouse is too dilute to make this alternative feasible.
- (8) Absorption is effective for streams with fairly high pollutant concentrations or for dilute streams if the pollutant is highly soluble in the chosen solvent, usually water. The warehouse emission stream, consisting of pentane and heptane, is dilute and pentane and heptane are not soluble in water, therefore, this option is not feasible.
- (9) Condensation systems are recommended for emission streams containing between 5,000 and 10,000 ppmv. The VOC content of the warehouse emission stream is about 11 ppmv. This concentration is too low to favor the process.
- (10) The combination of carbon adsorption with thermal oxidation is not a suitable VOC control technology for the warehouse because, as noted above, carbon adsorption is not suitable for extremely low inlet pollution concentrations.
- (11) Absorption concentrators are typically suited for batch processes or to equalize pollutant concentrations in a variable stream. The physical characteristics that drive the absorption of pollutants into a liquid also limit the opportunity to remove these pollutants from the liquid stream. Because the combination of absorption with incineration has only limited application, it was not considered feasible.

The technically feasible options are recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, and regenerative catalytic incineration. A cost analysis was performed to determine the economic feasibility of these control options for the warehouse VOC emissions. Syndicate Sales, Inc. based the BACT cost analysis on a federally enforceable limited VOC throughput of 152.3 tons per twelve (12) consecutive month period for the Foam Production Line. Based on stack test results, the portion of VOC emitted from the warehouse is 59% of the total emissions from the Foam Production Line. Therefore, the portion of emissions from the warehouse will be limited to: Limited VOC throughput (tons/yr) \* Percentage of emissions from warehouse (%) = 152.3 tons/yr \* (0.59) = 89.86 tons/yr.

The tables below show the results of the cost analysis.

(A) Capital Cost - for the Warehouse Control Options

Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Incineration	(1)	(1)	(1)	756,255
Regenerative Thermal Incineration	(1)	(1)	(1)	1,565,377
Recuperative Catalytic Incineration	(1)	(1)	(1)	1,296,296
Regenerative Catalytic Incineration	(1)	(1)	(1)	2,858,767

(1) Total Capital Cost includes Base Price, Direct Cost and Indirect Cost.

(B) Annual Operating, Maintenance & Recovery Cost - for the Warehouse Control Options

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Incineration	962,076	50,584	123,077	1,135,737
Regenerative Thermal Incineration	471,328	82,949	254,758	809,035
Recuperative Catalytic Incineration	1,017,409	72,186	170,083	1,259,679
Regenerative Catalytic Incineration	603,326	134,685	424,638	1,162,648

(C) Evaluation - for the Warehouse Control Options

Option	Limited Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
Recuperative Thermal Incineration	89.86	85.37	95	13,304
Regenerative Thermal Incineration	89.86	85.37	95	9,477
Recuperative Catalytic Incineration	89.86	85.37	95	14,756
Regenerative Catalytic Incineration	89.86	85.37	95	13,619

Methodology:

Emissions removed = (limited potential emissions from warehouse) \* (control efficiency)

\$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
  - a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
  - b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
  - c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.
2. Annual Cost
  - a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
  - b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

The cost analysis indicates that the expenditure for all the control options for the warehouse would be above the highest cost per ton generally considered as BACT. Because all options are either technically infeasible or economically infeasible, no VOC emission control has been determined to be BACT. Also, because the BACT analysis was based on a federally enforceable limited VOC throughput of 152.3 tons per year, this throughput limitation is part of the BACT determination. Thus in summary, BACT for the Foam Production Line has been determined to be the following:

- (1) Total VOC usage in the Foam Production Line shall not exceed 152.3 tons per 12 consecutive month period, with compliance determined at the end of each month. This is equivalent to limited VOC emissions of 98.9 tons per year based on 59% of the emissions being emitted uncontrolled from the warehouse and 41% of the emissions being emitted from the oven/normalizing tunnel which is controlled by the recuperative thermal incinerator with a minimum 90% capture efficiency and a minimum 95% destruction efficiency;
- (2) continuing use of the existing recuperative thermal incinerator on the oven/normalizing tunnel at all times that the oven/normalizing tunnel is in operation; and
- (3) no add-on controls for the warehouse.

### Testing Requirements

Testing is required on the recuperative thermal incinerator in the Foam Production Line because it has not been tested in the last five years and allowable VOC emissions are greater than 10 pounds per hour.

PM and PM-10 testing is required for the horizontal slab saw and baghouse because this unit emits greater than 40% of the potential PM-10 emissions which is one of the pollutants with potential emissions at major source levels.

### Compliance Requirements

Permits issued under 326 IAC 2-8 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, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

1. The Foam Production Line has applicable compliance monitoring conditions, which are listed as compliance determination conditions in the FESOP because the recuperative thermal incinerator is required to comply with 326 IAC 8-1-6 (BACT), as specified below:
  - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the recuperative thermal incinerator for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal incinerator at or above the hourly average temperature of 1400 °F.
  - (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
  - (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal incinerator at or above the hourly average temperature as observed during the compliant stack test.
  - (d) A time clock shall be installed, maintained and operated on the recuperative thermal oxidizer to indicate that the recuperative thermal oxidizer is in operation at all times that the foam curing oven and normalizing tunnel are operating.

These monitoring conditions are necessary because the recuperative thermal incinerator must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-8 (FESOP).

2. The Form & Package Line has applicable compliance monitoring conditions as specified below:

(a) Once per shift visible emission notations of each of the baghouse stack exhausts (DC-2 and DC-3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall record the total static pressure drop across the baghouse controlling the horizontal slab saw (DC-2), at least once per shift when the horizontal slab saw is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

(c) The Permittee shall record the total static pressure drop across the baghouse controlling the edge trim saw (DC-3), at least once per shift when the horizontal slab saw is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

- (d) An inspection shall be performed each calendar quarter of all bags controlling the horizontal slab saw and the edge trim saw when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (e) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the horizontal slab saw and the edge trim saw must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## Conclusion

The operation of this stationary foam production, forming, and packaging operation shall be subject to the conditions of the attached proposed FESOP No. F067-7701-00053.

## Appendix A: Emission Calculations

**Company Name:** Syndicate Sales, Inc.  
**Address City IN Zip:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**FESOP:** F067-7701  
**Pit ID:** 067-00053  
**Reviewer:** Trish Earls  
**Date:** December 12, 2002

<b>Total Potential To Emit (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Foam Production Line	Form & Package Line	Insignificant Activities*	TOTAL
PM **	22.64	155.54	0.14	178.32
PM10	22.64	155.54	0.14	178.32
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.78	1.78
VOC	1550.52	0.00	0.10	1550.62
CO	0.00	0.00	0.76	0.76
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.

\*Insignificant Activity Emissions represent emissions from natural gas combustion.

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

<b>Limited Potential To Emit (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Foam Production Line ***	Form & Package Line	Insignificant Activities*	TOTAL
PM **	0.23	1.55	0.14	1.92
PM10	0.23	1.55	0.14	1.92
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.78	1.78
VOC	98.90	0.00	0.10	99.00
CO	0.00	0.00	0.76	0.76
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.

\*Insignificant Activity Emissions represent emissions from natural gas combustion.

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

\*\*\*By accepting a 9.82% material usage limitation when the thermal incinerator is in operation, source wide VOC emissions are limited to less than 100.0 tons/yr, therefore, 326 IAC 2-7 does not apply.

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

**Company Name:** Syndicate Sales, Inc.  
**Address City IN Zip:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**FESOP:** F067-7701  
**Plt ID:** 067-00053  
**Reviewer:** Trish Earls  
**Date:** December 12, 2002

Potential Uncontrolled Emissions:								
Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Potential VOC pounds per hour	Potential VOC tons per year
Pentane (Blowing Agent)	5.25	100.00%	0.00%	100.00%	230.0	43.8	230.00	1007.40
Heptane (Blowing Agent)	5.73	100.00%	0.00%	100.00%	124.0	21.7	124.00	543.12
<b>Total Potential Emissions:</b>							<b>354.00</b>	<b>1550.52</b>
					Material Usage Limitation (4)	Oven/Norm. Tunnel VOC Control Eff.	Limited VOC pounds per hour	Limited VOC tons per year
					9.82%	85.50%	<b>22.58</b>	<b>98.90</b>

Note:

- (1) The resin used in this process is in a semi-solid form and has negligible emissions based on stack testing conducted on 1/27/95. Stack test results indicated 100% flash off of blowing agents.
- (2) The oven/normalizing tunnel portion of the Foam Production Line is controlled by a thermal incinerator with a control efficiency of 85.5% based on a required 90% capture and 95% destruction efficiency as specified in CP067-3136-00053, issued February 4, 1994.
- (3) Compliance tests have demonstrated that 41% of the VOC is emitted from the oven/normalizing tunnel and the remaining 59% is emitted in the warehouse.
- (4) When the thermal incinerator is operating at all times when the Foam Production Line is in operation, a 9.82% material usage limitation will limit VOC emissions to 98.9 tons per year for a source wide VOC limit of 99.0 tons per year, therefore, the requirements of 326 IAC 2-7 do not apply.

Methodology:

Weight % Organics = Weight % Volatiles - Weight % Water

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

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

Limited VOC = [((Potential VOC \* 0.41) \* (1-Control Efficiency)) + (Potential VOC \* 0.59)] \* Material Usage Limitation

**Appendix A: Process Particulate Emissions**

**Company Name:** Syndicate Sales, Inc.  
**Address City IN Zip:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**FESOP:** F067-7701  
**Plt ID:** 067-00053  
**Reviewer:** Trish Earls  
**Date:** December 12, 2002

<b>Potential Uncontrolled Emissions (tons/year)</b>							
Baghouse ID	Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
DC-1	Bun Saw (1)	1	0.00600	15.0	67.0	99.00%	22.64
DC-2	Horizontal Slab Saw (2)	1	0.06000	21.0	26.5	99.00%	125.36
DC-3	Edge Trim Saw (2)	1	0.00200	15.0	268.0	99.00%	30.18
Total Emissions Based on Rated Capacity at 8,760 Hours/Year							<b>178.18</b>
<b>Controlled Emissions (tons/year)</b>							
Baghouse ID	Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
DC-1	Bun Saw (1)	1	0.00600	15.0	67.0	99.00%	0.23
DC-2	Horizontal Slab Saw (2)	1	0.06000	21.0	26.5	99.00%	1.25
DC-3	Edge Trim Saw (2)	1	0.00200	15.0	268.0	99.00%	0.30
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls							<b>1.78</b>
(1) Part of Foam Production Line (2) Part of Form & Package Line							

**Allowable Emissions Calculation (per 326 IAC 6-3-2)**Bun Saw

$$\begin{aligned} \text{Equation from 326 IAC 6-3-2: } E &= 4.10 * (P^{0.67}) \\ \text{Process Wt. Rate (tons/hr), P1} &= 3.07 \\ \text{Allowable Emission Rate, E1} &= 8.69 \text{ lbs/hr} \\ &= 38.08 \text{ tons/yr} \end{aligned}$$

Horizontal Slab Saw

$$\begin{aligned} \text{Equation from 326 IAC 6-3-2: } E &= 4.10 * (P^{0.67}) \\ \text{Process Wt. Rate (tons/hr), P2} &= 0.29 \\ \text{Allowable Emission Rate, E2} &= 1.78 \text{ lbs/hr} \\ &= 7.80 \text{ tons/yr} \end{aligned}$$

Edge Trim Saw

$$\begin{aligned} \text{Equation from 326 IAC 6-3-2: } E &= 4.10 * (P^{0.67}) \\ \text{Process Wt. Rate (tons/hr), P3} &= 0.27 \\ \text{Allowable Emission Rate, E3} &= 1.72 \text{ lbs/hr} \\ &= 7.52 \text{ tons/yr} \end{aligned}$$

**PM-10 Emission Limits:**

For FESOPs, source wide allowable PM-10 emissions must be limited to less than 100 tons per year. Since PM-10 emissions were assumed to be equal to PM emissions, the allowable PM emission limits pursuant to 326 IAC 6-3-2 will also apply to PM-10 emissions and will limit PM-10 emissions to below 100 tons per year so that the requirements of 326 IAC 2-7 will not apply.

Methodology:Potential Uncontrolled Emissions:

$$\text{Emissions (tons/yr)} = \text{No. Units} * \text{Loading (grains/acf)} * \text{Air/Cloth Ratio (acfm/ft}^2\text{)} * \text{Filter Area (ft}^2\text{)} * 1 \text{ lb/7,000 grains} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1 \text{ ton/2,000 lbs} * 1/(1-\text{Control Efficiency})$$

Controlled Emissions:

$$\text{Emissions (tons/yr)} = \text{No. Units} * \text{Loading (grains/acf)} * \text{Air/Cloth Ratio (acfm/ft}^2\text{)} * \text{Filter Area (ft}^2\text{)} * 1 \text{ lb/7,000 grains} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * 1 \text{ ton/2,000 lbs} * 1/(1-\text{Control Efficiency})$$

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

**Company Name:** Syndicate Sales, Inc.  
**Address City IN Zip:** 945 South Lindsay Street, Kokomo, Indiana 46903  
**FESOP:** F067-7701  
**Plt ID:** 067-00053  
**Reviewer:** Trish Earls  
**Date:** December 12, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.3

37.8

Heat Input Capacity includes:  
thirty two (32) burners each rated at 0.135 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	94.0	5.5	40.0
Potential Emission in tons/yr	0.14	0.14	0.01	1.78	0.10	0.76

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, Residential Furnaces (no SCC)

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