

**PART 70 OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Aearo Company -E-A-R

**5457 West 79th Street
7911 Zionsville Road
8001 Woodland Drive**

Indianapolis, IN 46268

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-8852-00368	
Issued by: Original Signed by Janet G. McCabe	Issuance Date: February 19, 2003
Janet G. McCabe, Assistant Commissioner Office of Air Quality	
John B. Chavez, Administrator Office of Environmental Services	Expiration Date: February 19, 2008

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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) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic manufacturing operation.

Responsible Official:	Director of Indianapolis Manufacturing
Source Address:	Plant 1: 7911 Zionsville Road, Indianapolis, IN 46268 Plant 2: 5457 West 79 th Street, Indianapolis, IN 46268 Plant 3: 8001 Woodland Drive, Indianapolis, IN 46268
Mailing Address:	5457 West 79 th Street, Indianapolis, IN 46268
General Source Phone Number:	(317)692-6666
SIC Code:	3079
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under Section 112 of Clean Air Act Minor Source, under PSD

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This plastics manufacturing company consists of three (3) plants:

- (a) **Plant 1, EAR Specialty Composites**, is located at 7911 Zionsville Road, Indianapolis, IN 46268;
- (b) **Plant 2, Aeero Company**, is located at 5457 West 79th Street, Indianapolis, IN 46268; and
- (c) **Plant 3, IDC - Woodland Drive**, is located at 8001 Woodland Drive, Indianapolis, IN 46268

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

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

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

EAR Specialty Composites 7911 Zionsville Road

- (a) One (1) confor process, installed in 1990 and modified in 1999, with a maximum isopentane usage rate of 58,441 pounds per year, producing slab stock polyurethane foam and exhausting out stack SU-2.

- (b) One (1) PVC foam mixing and casting line, installed in the 1970's, identified as emission unit ID 5056-01, with a maximum capacity of 5,720,280 pounds of raw material input per year (653 pounds per hour) consisting of a PVC pellet mixing operation with a fabric filter and a casting line with a 6 million Btu per hour natural gas or propane fueled oven, with emissions exhausting to a catalytic oxidizer which exhausts to stack SC-1.
- (c) One (1) urethane foam forming line (Mushroom Pilot Line) installed in 1996, with a maximum VOC containing raw material usage rate of 17,078 lbs/yr, and with emissions exhausting out stack SU-8.
- (d) One (1) tote cleaning process installed in the 1970's, with a maximum solvent usage rate of 11,384 lbs/yr, and with fugitive emissions vented through general building ventilation stack SU-5.

Aero Company 5457 West 79th Street

- (e) Two (2) polyurethane molding lines, one installed in 1990 (identified as Emission Unit 901) and one installed in 1991 (identified as Emission Unit 902), with a maximum VOC/HAP containing raw materials usage rate of 922,110 lbs/yr. The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III. Emissions from these emission units exhaust out stack SU-12 (901) and stack SU-13 (902).

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 2-7-1(21)(G)(vi)(CC)] [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) 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, OAQ, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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

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

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

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

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

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

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

- (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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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 “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ or OES, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The 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 April 15 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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

and

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES Administrator within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

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

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

OES's phone and facsimile numbers:
Telephone Number: 317/327-2234
Facsimile Number: 317/327-2274

- (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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ, and OES 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 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.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

and
Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and

reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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, Indiana 46206-6015

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (2) If IDEM, OAQ, and OES, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, 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, and OES, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]
If IDEM, OAQ, and OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.18 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]
-
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and
- Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.19 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]
-
- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and OES 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, or OES the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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, 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.
- C.2 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or 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 unit vented to the control equipment is in operation.
- C.7 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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) 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 provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.8 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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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 ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in January of 1997 and submitted an updated ERP in October of 2002.
- (b) Upon direct notification by IDEM, OAQ, and/or OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 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:

- (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);

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES Administrator 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Office of Environmental Services (OES)
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, IN 46221

- (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, and OES 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1: EAR Specialty Composites (7911 Zionsville Road)

- (a) One confor process, installed in 1990 and modified in 1999, with a maximum isopentane usage rate of 58,441 pounds per year, producing slab stock polyurethane foam and exhausting out stack SU-2.

(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 2-7-5(1)]

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

Pursuant to 097-11552-00319, issued on November 18, 1999 and revised through this Title V permit, the input of isopentane to the confor process shall be limited to less than 31,000 pounds per twelve (12) consecutive month period, which is equivalent to 15.5 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

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

D.1.2 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The VOC content of each raw material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The amount of VOC containing raw material and solvent used;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Material usage records shall differentiate between those used as raw materials and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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 "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1: EAR Specialty Composites (7911 Zionsville Road)

- (b) One PVC foam mixing and casting line, installed in the 1970's, identified as emission unit ID 5056-01, with a maximum capacity of 5,720,280 pounds of raw material input per year (653 pounds per hour) consisting of a PVC pellet mixing operation with a fabric filter and a casting line with a 6 million Btu per hour natural gas or propane fueled oven, with emissions exhausting to a catalytic oxidizer which exhausts to stack SC-1.

(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 2-7-5(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 PVC foam mixing shall not exceed 1.94 pounds per hour when operating at a process weight rate of 653 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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with condition D.2.1, the fabric filter baghouse for particulate control shall be in operation and control emissions from the mixing operation at all times that the mixing operation is in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1: EAR Specialty Composites (7911 Zionsville Road)

- (c) One urethane foam forming line (Mushroom Pilot Line) installed in 1996, with a maximum VOC containing raw material usage rate of 17,078 lbs/yr, and with emissions exhausting out stack SU-8.
- (d) One tote cleaning process installed in the 1970's, with a maximum solvent usage rate of 11,384 lbs/yr, and with fugitive emissions vented through general building ventilation stack SU-5.

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

These facilities are not insignificant activities, but they have no applicable requirements other than those covered in Sections A, B and C of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 1: EAR Specialty Composites (7911 Zionsville Road)

- (e) Two polyurethane molding lines, one installed in 1990 (identified as Emission Unit 901) and one installed in 1991 (identified as Emission Unit 902), with a maximum VOC/HAP containing raw materials usage rate of 922,110 lbs/yr, and exhausting out stacks SU-12 (901) and stack SU-13 (902). The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III.

(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 2-7-5(1)]

D.4.1 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 PVC foam mixing and casting line shall not exceed 1.39 pounds per hour when operating at a process weight rate of 400 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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per 12 months. (Plant 1: EAR Specialty Composites - 7911 Zionsville Road)

(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 2-7-5(1)] (Cold Cleaning Degreaser Operations)

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph counties and which have potential emissions of one hundred (100) tons or greater per year, the Permittee shall:

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

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreasers without remote solvent reservoirs existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties, the Permittee shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)),

then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Aearo Company - E-A-R
Source Address: 7911 Zionsville Road, Indianapolis and 5457 West 79th Street, Indianapolis
Mailing Address: 5457 West 79th Street, Indianapolis, IN 46268
Part 70 Permit No.: T097-8852-00368

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:

Phone:

Date:

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

**100 North Senate Avenue / P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION**

**2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Aeero Company - E-A-R
Source Address: 7911 Zionsville Road, Indianapolis and 5457 West 79th Street, Indianapolis
Mailing Address: 5457 West 79th Street, Indianapolis, IN 46268
Part 70 Permit No.: T097-8852-00368

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C The 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); andC The 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 ₂ , VOC, NO _x , 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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**Part 70 Usage Report
(Submit Quarterly)**

Source Name: Aero Company - E-A-R
Source Address: 7911 Zionsville Road, Indianapolis and 5457 West 79th Street, Indianapolis
Mailing Address: 5457 West 79th Street, Indianapolis, IN 46268
Part 70 Permit No.: T097-8852-00368
Facility: Confor Process (7911 Zionsville Road)
Parameter: Isopentane usage
Limit: less than 31,000 pounds of isopentane per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Aearo Company - E-A-R
Source Address: 7911 Zionsville Road, Indianapolis and 5457 West 79th Street, Indianapolis
Mailing Address: 5457 West 79th Street, Indianapolis, IN 46268
Part 70 Permit No.: T097-8852-00368

Months: _____ to _____ Year: _____

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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5
- (8) 326 IAC 2-3-1 through 2-3-5;
- (9) 326 IAC 2-4-1 through 2-4-6;
- (10) 326 IAC 2-6-1 through 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1-1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2;
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2;
- (33) 326 IAC 11-2-1 through 11-2-3;
- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;
- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption states that "or the administrator of OES" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption states that "or the administrator of OES" is added in (b)).

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document for a Part 70 Operating Permit**

Source Name: Aearo Company - E-A-R
Source Location: 5457 West 79th Street
7911 Zionsville Road
8001 Woodland Drive
County: Marion
SIC Code: 3079
Operation Permit No.: T097-8852-00368
Permit Reviewer: Amanda Hennessy

On December 20, 2002, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Aearo Company -E-A-R had applied for a Part 70 Operating Permit to operate a plastics manufacturing operation. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes to the draft Title V Permit will be made. The TSD will remain as it originally appeared when published. OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Permit Table of Contents has been updated to reflect changes where necessary without being included in the response to comments.

On January 17, 2003, Aearo Company - E-A-R submitted comments on the proposed Part 70 permit. The summary of the comments and responses to comments follows with ~~strikeout~~ showing deleted text and **bold** showing new text.

Comment (1):

Draft Permit: Section D.1.2 Preventive Maintenance Plan: It is our understanding that Preventive Maintenance Plans (PMPs) are normally required for emission units that have air pollution control devices. The confor process regulated by this section of the permit does not have a control device and emissions levels would not be affected by maintenance on the process equipment. Emissions are controlled by limiting the amount of raw material usage. We do not believe that implementation of a PMP is necessary and request that Section D.1.2 be removed from the permit.

Upon request, the Permittee submitted the following additional information: The second stage in the confor process is where MDI, isopentane, and color are added. These materials are added from 55 gallon drums. A lid with a permanently mounted pump is placed on the drum to add materials to the mixing unit. The mixing unit is a single unit stainless steel tank. The last stage is pouring the material in a mold. This is an open mold made of wood and metal brackets.

Response to Comment (1):

The requirement to maintain a Preventive Maintenance Plan can be applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits) to obtain a permit. Upon review of the process described above, there is no benefit from a PMP on this process since there is no point in the process where maintenance could impact emission levels. Therefore, since the limit is based on the input of raw material and emission levels would not be affected by maintenance on the process equipment, IDEM and OES agree that implementation of a PMP is not necessary for this equipment. This condition has been removed.

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

Comment (2):

Draft Permit: Section D.1.3 Volatile Organic Compounds (VOC): It is our understanding that this section is normally applicable to surface coating operations. The confor process uses isopentane which is a VOC and this can be confirmed using the material safety data sheets. However, the conditions in Section D.1.3 to provide "as supplied" and "as applied" VOC data sheets and to determine compliance using Method 24 are not relevant to our process. We request that Section D.1.3 be removed from the permit or modified to exclude language related to "as supplied" or "as applied" and the reference to Method 24.

Response to Comment (2):

IDEM and OES agree that this compliance determination language is not applicable to this type of operation. Compliance will be determined by record keeping that is required in Condition D.1.2 (Previously Condition D.1.4). The condition has been removed.

~~**Compliance Determination Requirements**~~

~~D.1.3 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and 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 manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and OES reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Comment (3):

Draft Permit: Section D.2.3 Visible Emissions Notations: It is our understanding that compliance monitoring requirements, such as visible emission notations, are only required for larger emission units with allowable particulate emissions of greater than 10 lbs/hr. As stated in Section D.2.1 of the draft permit, allowable particulate emissions from this emission unit are 1.94 lbs/hr. We request that Section D.2.3 be removed from the permit.

Response to Comment (3):

IDEM and OES agree. Since the potential to emit before control is less than 6.53 lb of PM per hour, IDEM and OES will not require visible emission notations for the baghouse. This condition has been removed.

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

~~D.2.3 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the mixing operation stack exhaust shall be performed once per shift 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 this permit.~~

Comment (4):

Draft Permit: Section D.2.4 Recordkeeping Requirements: In conjunction with our comments provide for Section D.2.3, we request that Section D.2.4 also be removed from the permit.

Response to Comment (4):

IDEM and OES agree. Since Condition D.2.3 has been removed, Condition D.2.4, recordkeeping of the requirements under Condition D.2.3, should be deleted. Since the visible emission notations recordkeeping is the only recordkeeping that was required for this emission unit, Condition D.2.4 (Recordkeeping Requirements) has been removed.

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

~~D.2.4 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the once per shift visible emission notations of the mixing operation stack exhaust.~~

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Aearo Company -E-A-R
Source Location: Plant 1: 7911 Zionsville Road, Indianapolis, IN 46268
Plant 2: 5457 West 79th Street, Indianapolis, IN 46268
Plant 3: 8001 Woodland Drive, Indianapolis, IN 46268
County: Marion
SIC Code: 3086 (NAICS Code 326150)
Operation Permit No.: T097-8852-00368
Permit Reviewer: Amanda Hennessy

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 permit application from Aearo Company -E-A-R relating to a plastics manufacturing operation.

Source Definition

This plastics manufacturing company consists of three (3) plants:

- (a) Plant 1, EAR Specialty Composites, is located at 7911 Zionsville Road, Indianapolis, IN 46268;
- (b) Plant 2, Aearo Company, is located at 5457 West 79th Street, Indianapolis, IN 46268; and
- (c) Plant 3, IDC - Woodland Drive, is located at 8001 Woodland Drive, Indianapolis, IN 46268.

Since the three (3) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

EAR Specialty Composites used to be tracked by the source ID 00319. When the decision was made that EAR Specialty Composites and Aearo Company would be considered one source, a new source ID number was given to the combined source. The combined source now has the source ID 00368.

Permitted Emission Units and Pollution Control Equipment

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

EAR Specialty Composites (Plant 1)

- (a) One (1) confor process, installed in 1990 and modified in 1999, with a maximum isopentane usage rate of 58,441 pounds per year, producing slab stock polyurethane foam and exhausting out stack SU-2.

- (b) One (1) PVC foam mixing and casting line, installed in the 1970's, identified as emission unit ID 5056-01, with a maximum capacity of 5,720,280 pounds of raw material input per year (653 pounds per hour) consisting of a PVC pellet mixing operation with a fabric filter and a casting line with a 6 million Btu per hour natural gas or propane fueled oven, with emissions exhausting to a catalytic oxidizer which exhausts to stack SC-1.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

EAR Specialty Composites (Plant 1)

- (c) One (1) urethane foam forming line (Mushroom Pilot Line) installed in 1996, with a maximum VOC containing raw material usage rate of 17,078 lbs/yr, and with emissions exhausting out stack SU-8.
- (d) One (1) tote cleaning process installed in the 1970's, with a maximum solvent usage rate of 11,384 lbs/yr, and with emissions vented through general building ventilation stack SU-5.

Aeero Company (Plant 2)

- (e) Two (2) polyurethane molding lines, one installed in 1990 (identified as Emission Unit 901) and one installed in 1991 (identified as Emission Unit 902), with a maximum VOC/HAP containing raw materials usage rate of 922,110 lbs/yr, and exhausting out stack SU-12 (901) and stack SU-13 (902). The raw materials used do not meet the definitions of polyurethane under 40 CFR Part 63, Subpart III.

Insignificant Activities

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

EAR Specialty Composites (Plant 1)

- (a) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified as follows, for volatile organic compounds (VOC), less than three (3) pounds per hour or fifteen (15) pounds per day, whichever is lower:
 - (1) One (1) fabrication process, installed in 1986, with a maximum combined adhesive application rate of 6,374 lbs/yr, with emissions vented through general building ventilation stack SU-4.
 - (2) One (1) isocyanate process, installed in 1990, with a maximum VOC containing raw material input of 5,800 lbs/yr, producing molded flexible polyurethane, and emissions exhausting out stack SU-3.
 - (3) One (1) PVC extrusion process (NRM Compound Extrusion) installed in the 1970's, with a maximum raw material usage rate of 5,694,000 lbs/yr, and with emissions exhausting out stack SU-7.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (d) Any unit, not regulated by a NESHAP, emitting greater than one (1) pound per day but less than twelve and five-tenths (12.5) pounds per day or two and five-tenths (2.5) tons per year of any combination of HAPs:

- (1) One (1) parts cleaning process installed in 1990, with a maximum solvent usage rate of 2,659 lbs/yr, and emissions exhausting out of stack SU-6.
- (e) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (f) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.
- (g) Combustion source flame safety purging on startup.
- (h) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38^N C (100^N F).
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20^N C (68^N F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) Closed loop heating and cooling systems.
- (j) Infrared cure equipment.
- (k) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.
- (l) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (m) On-site fire and emergency response training approved by the department.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^N C.
- (o) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Aero Company (Plant 2)

- (p) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified as follows, volatile organic compounds (VOC) less than three (3) pounds per hour or fifteen (15) pounds per day, whichever is lower:
 - (1) Two (2) PVC extrusion process lines (Cord Extruders), installed in 1992, with a maximum VOC/HAP containing raw material usage rate of 1,147,561 lbs/yr. Emissions from this emission unit exhaust out stack SU-9.
 - (2) One (1) PVC foam densifier process (Cord Foam Densifier) installed in 1991, with a maximum VOC/HAP containing raw material usage rate of 2,460,904 lbs/yr. Emissions from this emission unit exhaust out stack SU-10.

- (3) Two (2) cord tipper processes installed in 1993, with a maximum tipper solutions usage rate of 3,415 lbs/yr. Emissions from this emission unit exhaust out stack SU-11.
- (q) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (r) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

IDC - Woodland Drive (Plant 3)

- (s) The following equipment related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

Existing Approvals

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

- (a) Certificate of Operation 5056, issued on November 22, 1991 for a casting line with a catalytic incinerator and an extruder located at EAR Specialty Composites (Plant 1); and
- (b) Minor Source Modification 097-11552-00319, issued on November 18, 1999 for modifications to the confor process located at EAR Specialty Composites (Plant 1).

All conditions from previous approvals were incorporated into this Part 70 permit with one revision:

The wording of Condition D.1.1 of the Source Modification No. 097-11552-00319 will be changed in this permit to limit isopentane usage rather than limiting VOC input. Under this change, the facility will still be limited to less than 25 tons per twelve (12) consecutive month period such that 326 IAC 8-1-6 does not apply. Limiting the isopentane usage to 31,000 pounds will limit VOC emissions from isopentane to 15.5 tons. Therefore, this 15.5 tons of VOC emissions from isopentane together with the potential to emit VOC of the other two VOC containing raw materials (B-2000 potential emissions = 9.17 tons per year and MCI potential emissions = 0.02 tons per year) keeps the potential to emit of the Confor process below 25 tons per year (actual potential to emit from the Confor process will be 24.69 tons per year).

The Condition used to read: Pursuant to 326 IAC 8-1-6 the input of VOC to the Confor process shall be limited to 25 tons per twelve consecutive month period, rolled monthly. Therefore the New Facilities General Emissions Reduction Requirement Regulation 326 IAC 8-1-6 does not apply.

The Condition will now read: Pursuant to 097-11552-00319, issued on November 18, 1999 and revised through this Title V permit, the input of isopentane to the confor process shall be limited to less than 31,000 pounds per per twelve (12) consecutive month period, which is equivalent to 15.5 tons of VOC per twelve (12) consecutive month period, with compliance determined monthly. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM has reviewed this matter. The source has claimed limited liability for the polyurethane molding lines. This proposed permit is intended to satisfy the requirements of 326 IAC 2-1.2 (Construction Permit Rules).

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional information was received on July 30, 1998, August 3, 1998, October 3, 1999, and September 5, 2002.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Potential To Emit

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 To Emit (tons/year)
PM	< 100
PM-10	< 100
SO ₂	< 100
VOC	> 100 but < 250
CO	< 100
NO _x	< 100

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

HAP's	Potential To Emit (tons/year)
1, 1, 1 Trichloroethane	< 10
Methylene Chloride	< 10
Methyl Ethyl Ketone	< 10
Total Combined	< 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) Fugitive Emissions
 Since this type of operation is not one of the 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-----
PM-10	-----
SO ₂	-----
VOC	36.2771
CO	-----
NO _x	-----
HAP (specify)	not reported

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 Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Confor process				< 25 ¹			
PVC Foam Mixing and Casting Line				47.19			<1
Urethane Foam Forming Line (Mushroom Pilot Line)				10.03			
Tote Cleaning Process				<1			5.66
Polyurethane Molding Line (901)				22.6			<1
Polyurethane Molding Line (902)				22.6			<1
Total Emissions	< 250	< 250	< 250	< 250	< 250	< 250	< 250

¹ = MSM 097-11552-00319, issued on November 18, 1999 to limit out of 326 IAC 8-1-6.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance 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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, SO₂, NO_x, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) The source is not subject to the requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, Subpart DDD, because the source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR 60.561.
- (b) The source is not subject to the requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, Subpart Kb, because the source does not have any storage vessels with a capacity greater than or equal to 40 cubic meters used to store volatile organic liquids.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart III since the source is not a major source of HAPs.

- (d) The degreasing operations are not subject to 40 CFR 63, Subpart T because the Permittee does not use solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform in a total concentration greater than 5% by weight as a cleaning and/or drying agent.
- (e) The tote cleaning process is not subject to 40 CFR 63, Subpart T because tote cleaning does not fit the definition of solvent cleaning machine in 40 CFR 63.461.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Pursuant to 326 IAC 2-7-5(13)(A), Part 70 permits must require that the source maintain preventive maintenance plans (PMPs) as described in 326 IAC 1-6-3.

Based on OES's review:

- (a) a PMP is required for the confor process because it has a condition limiting the PTE.
- (b) a PMP is not required for the PVC foam mixing and casting line because (a) the line does not have a required VOC control device and actual emissions do not exceed 25 tons per year and (b) the line has a PM control device but allowable emissions do not exceed 10 lb/hr.
- (c) a PMP is not required for the two Polyurethane molding lines (901 and 902) because the units do not have control devices and actual emissions do not exceed 25 tons per year.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) in January of 1997. The source has submitted an updated ERP in October of 2002. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not one of the listed source types and does not have potential emissions greater than 250 tons per year of any pollutant regulated by the Clean Air Act, therefore, this source is not a major source for PSD purposes.

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

This source has not constructed or reconstructed a major source of hazardous air pollutants since July 27, 1997, therefore, 326 IAC 2-4.1 is not applicable to this source at this time.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (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 thirty percent (30%) 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 6-1

326 IAC 6-1 is not applicable to any facility at this source since the PTE of particulate matter is less than 100 tons per year and actual particulate matter emissions are less than 10 tons per year and the source is not listed in 326 IAC 6-1-12.

326 IAC 8-6

No emission unit located at this source is subject to the requirements of 326 IAC 8-6 since no single emission unit that was existing as of January 1, 1980 (and located in Marion County) or commencing operation between October 7, 1974 and January 1, 1980 had the potential to emit greater than 100 tons per year.

State Rule Applicability - Individual Facilities

Confor Process (Plant 1 - EAR Specialty Composites)

326 IAC 6-3-2 Particulate

Pursuant to 326 IAC 6-3-1(b)(14), this facility is exempt from 326 IAC 6-3-2, because potential particulate emissions are less than 0.551 pounds per hour.

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

The Confor process was a new facility, as of January 1, 1980, that is not regulated by any other provision of Article 8. Therefore, the source has accepted an input limit of 31,000 pounds of isopentane to keep potential emissions of VOC less than 25 tons each 12 month period with compliance determined monthly so that the Confor process is not subject to the requirements of 326 IAC 8-1-6. For further discussion on this limit see the Existing Approvals section of this TSD.

PVC Foam Mixing and Casting Line (Plant 1 - EAR Specialty Composites)

326 IAC 6-3-2 Particulate

Pursuant to 326 IAC 6-3-2, the particulate from the PVC Foam Mixing and Casting Line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The process weight rate (P) for the PVC Foam Mixing and Casting Line is 653 lb/hr, therefore
 $E = 1.94 \text{ lb/hr.}$
 $(653 \text{ lb/hr} * 1 \text{ ton}/2000 \text{ lb})^{0.67} * 4.10 = 1.94 \text{ lb/hr}$

Based on a paint mixing emission factor (from AP-42 Table 6.4-1) of 20 pounds of PM per ton of dry ingredients mixed, uncontrolled emissions from the mixing operation will be 6.53 lb of PM per hour. The baghouse is required for the mixing operation to be in compliance with the PM limit of 1.94 lb/hr.

Mushroom Pilot Line (Plant 1 - EAR Specialty Composites)

326 IAC 6-3-2 Particulate

Pursuant to 326 IAC 6-3-1(b)(14), this facility is exempt from 326 IAC 6-3-2, because potential particulate emissions are less than 0.551 pounds per hour.

326 IAC 2

The Mushroom Pilot Line had emissions less than 10 tons per year, therefore it was exempt from permitting requirements pursuant to 326 IAC 2-1.1-3(d). This facility is, at the time of the preparation of the Title V permit, being modified. The modification did not meet the modification criteria under 326 IAC 2-7.10.5 and therefore no source modification application or source modification permit was required. This modification is being incorporated into the Title V permit.

Tote Cleaning Process (Plant 1 - EAR Specialty Composites)

326 IAC 6-3-2 Particulate

This process is not subject to 326 IAC 6-3-2 because it does not meet the definition of a manufacturing process as defined in 326 IAC 6-3-1.5. It does not meet the definition because the process does not emit or have the potential to emit particulate.

Polyurethane Molding Lines (901 and 902) (Plant 2 - Aearo Company)

326 IAC 6-3-2 Particulate

Pursuant to 326 IAC 6-3-2, the particulate from the polyurethane molding lines shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The process weight rate (P) for the Polyurethane Molding Lines is 400 lb/hr, therefore

$E = 1.39 \text{ lb/hr.}$

$(400 \text{ lb/hr} * 1 \text{ ton}/2000 \text{ lb})^{0.67} * 4.10 = 1.39 \text{ lb/hr}$

326 IAC 8-1-6

The polyurethane molding lines are new facilities since January 1, 1980 and they are not regulated by another article 8 provision, however, the potential VOC emissions from each line are less than 25 tons per year (PTE for each line is 22.6 tons per year). Therefore, 326 IAC 8-1-6 is not applicable to the two polyurethane molding lines.

Degreasers (Plant 1 - EAR Specialty Composites)

326 IAC 8-3-2

The degreasers are subject to the requirements of 326 IAC 8-3-2 because they are located at a source located in Marion County with potential VOC emissions greater than 100 tons per year and installed prior to 1980.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5

The degreasers are subject to the requirements of 326 IAC 8-3-5 because they are cold cleaner degreasers at a source located in Marion County and existing as of July 1, 1990.

Pursuant to 326 IAC 8-3-5(a), the Permittee shall ensure the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Soldering Equipment (Plant 3 - IDC - Woodland Drive)

326 IAC 6-3-2 Particulate (PM)

This process is not subject to 326 IAC 6-3-2 because it does not meet the definition of a manufacturing process as defined in 326 IAC 6-3-1.5. No particulate emissions are expected from this process.

Compliance Requirements

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

Compliance Determination Requirements in 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.

Compliance monitoring plans for demonstrating compliance are as follows under Rule 326 IAC 2-7-5(3) which requires all permitted sources to demonstrate that all emitting units are in continuous compliance with all "applicable requirements" as defined by 326 IAC 2-7-1(6). Compliance is demonstrated by taking sufficient measurements of emissions or operating parameters or by gathering other data.

- (a) The catalytic oxidizer on the PVC mixing and casting line is not required by any state, federal or local regulations at this time, therefore, IDEM and OES do not have authority to require compliance monitoring.
- (b) The baghouse on the mixing operation of the PVC mixing and casting line is required in order for the unit to be in compliance with the 326 IAC 6-3-2 PM limit. The baghouse has applicable compliance monitoring conditions as specified below:
 - (1) Visible emissions notations of the mixing baghouse exhaust shall be performed once per shift during normal daylight operations. A trained employee will 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.

Visible emission notations are required as a check to ensure that the baghouse is working properly. The baghouse must be working properly to demonstrate compliance with the 326 IAC 6-3-2 PM limit.

Due to the low controlled emissions from the baghouse (controlled emissions fall into the exempt levels), the facility will not be required to monitor total static pressure drop across the baghouse by this permit or to perform baghouse inspections.

- (c) All other emission units with 326 IAC 6-3-2 applicability (confor process, mushroom pilot line, polyurethane molding lines) have negligible PM emissions, therefore no visible emissions will be required for compliance monitoring.

Conclusion

The operation of this plastics manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T097-8852-00368**.

7911 Zionsville Road and 5457 W. 79th Street

October 2002

Permit Reviewer: A. Hennessy

Source	2001 Actual Usage (lbs/yr)	Maximum Usage (lbs/yr)	VOC Content %	Total HAPs Content %	Control Equipment		2001 Actual Emissions		Potential to Emit	
					% Capture & Control	Control Device	VOC	Combined HAPs	VOC	Combined HAPs
							(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Fab (Fabrication) 2001 hours of operation = 6000										
Bostik	3,830.50	5,593	75.0%	52.0%			1.44	1.00	2.10	1.45
Boscodur	534.80	781	62.1%	62.1%			0.17	0.17	0.24	0.24
Subtotal	4,365.30	6,374					1.60	1.16	2.34	1.70
Confor¹ 2001 hours of operation = 2000										
Isopentane	13,342.60	58,441	100.0%	0.0%			6.67	0.00	29.22	0.00
B-2000	see "B-2000 Mass Balance"			0.0%			1.88	0.00	9.17	0.00
MDI	see "Confor MDI Calculation"						0.001	0.001	0.02	0.02
Subtotal							8.55	0.001	38.41	0.02
PTE Limit in Permit									25.00	
Isoloss¹ 2001 hours of operation = 2000										
Ease Release 400 Aerosol	327.10	1,433	30.0%	0.0%			0.05	0.00	0.21	0.00
Thixon 423	447.80	1,961	76.0%	46.3%			0.17	0.10	0.75	0.45
Thixon 907	161.20	706	100.0%	50.2%			0.08	0.04	0.35	0.18
B-2000							0.21		0.92	
Subtotal	936.10	4,100					0.51	0.14	2.23	0.63
Parts Cleaning 2001 hours of operation = 2000										
MeCl Technical Grade	607.00	2,659	0.0%	100.0%			0.00	0.30	0.00	1.33
Subtotal							0.00	0.30	0.00	1.33
Tote Cleaning 2001 hours of operation = 3613 Hours of operation is linked to Casting Line										
Chlorothene (R) SM Solvent	4,695.00	11,383	3.0%	99.5%			0.07	2.34	0.17	5.66
Subtotal							0.07	2.34	0.17	5.66
PVC Mixing and Casting Line 2001 hours of operation = 3613 Based on calc. method of hrs of op. is not used to calc. potential emissions										
PVC ^{2,4}	1,904,231.20	5,720,280	1.65%	0.0001%	85%	T	2.36	0.00014	7.08	0.0004
Colorite CP 1730 PVC Resin ^{2,4}	6,755.00	included above	1.65%	0.0001%	85%	T	0.01	0.000001		
Colorite CP 1757 PVC Resin ^{2,4}	4,520.00	included above	1.65%	0.0001%	85%	T	0.01	0.0000003		
Subtotal						w/o control	15.71	0.0010	47.19	0.0029
							2.37	0.0001	7.08	0.0004
NRM Compound Extrusion 2001 hours of operation = 2833 Based on calc. method of hrs of op. is not used to calc. potential emissions										
PVC ^{3,4}	318,920.50	5,694,000	0.085%	0.0001%			0.14	0.0002	2.42	0.0029
Subtotal							0.14	0.0002	2.42	0.0029
Mushroom Pilot Line 2001 hours of operation = 1760										
SP-731	3.00	4,169.0	99.97%	0.00%			0.001	0.00	2.084	0.00
6538 Mold Release	70.00	12,909.0	80.0%	0.00%			0.03	0.00	5.16	0.00
6538HS40 Mold Release	0.00	12,375.0	45.0%	0.00%			0.00	0.00	2.78	0.00
Subtotal	73.00	17,078.0					0.03	0.00	10.03	0.00
AEARO										
Polyurethane 901 & 902 2001 hours of operation = 9310										
Hypol 2000 ⁶	232,381.80	463,678.0	3.0%	0.03%			3.49	0.03	6.96	0.07
UCAR LATEX 154S	189,782.00	378,677.0	0.083%	0.083%			0.08	0.08	0.16	0.16
Releasagen H-15-1 Bulk	39,600.00	79,015.0	95.500%	0.000%			18.91	0.00	37.73	0.00
Releasagen H-15-1N2 Aerosol	370.93	740.0	97.000%	0.000%			0.18	0.00	0.36	0.00
Subtotal	462,134.73	922,110.0					22.65	0.11	45.20	0.23
Cord Extruders 2001 hours of operation = 6600										
Teknor Apex 013-1320 ⁵	18,115.00	48,087.1	0.085%	0.000%			0.01	0.00	0.02	0.00
PVC 013-1324 ⁵	6,000.70	15,929	0.085%	0.000%			0.00	0.00	0.01	0.00
PVC 102-1500 ⁵	408,184.70	1,083,545	0.085%	0.000%			0.17	0.00	0.46	0.00
Subtotal	432,300.40	1,147,561					0.18	0.00	0.49	0.00
Cord Foam Densifier 2001 hours of operation = 1200										
PVC 103-3002 ⁵	337,110.10	2,460,903.7	0.085%	0.000%			0.14	0.00	1.05	0.00
Cord Tipplers 2001 hours of operation = 4788										
S-3841 (THF & Acetone) 2007	1,711.60	3,415.0	78.500%	0.000%			0.67	0.00	1.34	0.00
Urethane Plug Molding Line Future Operation (2004)										
SP-731		4,175	99.97%	0.00%			0.000	0.00	2.087	0.00
6538 Mold Release		35,675.0	80.0%	0.00%			0.00	0.00	14.27	0.00
Subtotal		39,850.0					0.00	0.00	16.36	0.00
TOTAL with current permit caps and control requirements=							36.92	4.0597	113.70	9.569
TOTAL without current permit caps and control requirements=							50.26	4.0595	167.23	9.571

Notes:

¹ Other compounds are used in this area but react and do not volatilize

² Regarding VOCs. Based on the emission factor of 10.79 lbs VOC/Hr uncontrolled (1994 stack test) @ 653 lb/hr production = 33 lb VOC/ton material. The % VOC was calculated as 10.79 lb VOC / 653 lb material

³ Regarding VOCs. Based on the emission factor of 0.55 lbs VOC/Hr uncontrolled (1994 stack test) @ 650 lb/hr production = 1.69 lb VOC/ton material. The % VOC was calculated as 0.55 lb VOC / 650 lb material.

⁴ Regarding HAPs. 1% of raw material VC content is emitted (or 0.000101%). According to EAR rate of reaction studies (completed during product development) >99% of the raw material VC reacts during production and is not emitted. Final products contain 0.001% vinyl chloride monomer. Therefore, 0.00101% was in raw material.

⁵ Based on the emission factor of 1.69 lb VOC/ton material from EAR Specialty Composites NRM Compound Extrusion. See note 3.

⁶ Regarding HAPs. 1% of raw material TDI content is emitted (or 0.03%). According to EAR rate of reaction studies (completed during product development) >99% of the raw material TDI reacts during production and is not emitted. Raw material TDI is 3%.

T= Thermal Oxidizer