NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for FXI, Inc. in Allen County

Part 70 Operating Permit Renewal No.: T003-40692-00225

The Indiana Department of Environmental Management (IDEM) has received an application from FXI, Inc. located at 3005 Commercial Road, Fort Wayne, Indiana 46809 for a renewal of its Part 70 Operating Permit issued on August 20, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow FXI, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Allen County Public Library
2200 Lower Huntington Road
Fort Wayne, Indiana, 46819

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T003-40692-00225 in all correspondence.
Comments should be sent to:

Nicholas Walters  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCE 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Nicholas Walters or (317) 234-9513  
Or dial directly: (317) 234-9513  
Fax: (317) 232-6749 attn: Nicholas Walters  
E-mail: nbwalter@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Nicholas Walters of my staff at the above address.

Iryn Callieung, Section Chief  
Permits Branch  
Office of Air Quality
FXI, Inc.
3005 Commercial Road
Fort Wayne, Indiana 46809

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.
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Attachment C - Subpart DDDDD - National Emissions Standards for Hazardous Air Pollutants for
Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
SECTION A  SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>3005 Commercial Road, Fort Wayne, Indiana 46809</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>260-747-9729</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3086 (Plastic Foam Products)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Allen</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Major Source, under PSD Rules</td>
</tr>
<tr>
<td></td>
<td>Major Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) Flexible Slabstock Polyurethane Foam Manufacturing Process (PL-01), producing a maximum of nine (9.0) million board feet per day of polyurethane foam, consisting of:

(1) One (1) Periphlex Pour Line with integral mix chamber PL-01a), constructed in 1968, with maximum usage of 69.0 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19).

(2) One (1) Polyurethane Foam Production Line with integral mix chamber (PL-01c), constructed in 2010, with maximum usage of 80.80 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting to five (5) stacks (ID Nos. 60-64).


[Under 40 CFR 63, Subpart III, this is considered an existing facility.]

(b) One (1) Natural Gas-fired Flame Laminator Machine (ID No. FL-02), constructed in 1995, with a maximum capacity of 40,000 square feet per hour with a process weight rate of 1 ton per hour, with a heat input capacity of 0.35 MMBtu/hr, using no controls and exhausting through two (2) stacks (ID Nos. 02-002 and FL2).

Under 40 CFR 63, Subpart MMMMM, this is considered an existing facility.
(c) One (1) Thermal Reticulation Unit (ID No. TRU-01), constructed in 1968 and modified in 2007, with a maximum throughput of 87,000 cycles per year, using no controls and exhausting through nine (9) stacks (ID Nos. 35-43).

(d) One (1) Thermal Reticulation Unit (ID No.: TRU-02), constructed in 2007, with a maximum throughput of 87,600 cycles per year, using no controls and exhausting through eight (8) stacks (ID Nos.: 52-59).

(e) Two (2) Natural Gas-fired Boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each with a maximum heat input capacity of 14.60 MMBtu/hr, using No. 2 distillate fuel oil as back-up fuel for maintenance/testing/training purpose up to 48 hours per year or during periods of gas curtailment or supply interruptions, using no controls and each exhausting through one (1) stack (ID Nos. 45 and 46).

Under 40 CFR 63, Subpart DDDDD, these are considered existing facilities.

(f) One (1) Felter (FPB), constructed in 1993, with maximum capacity of 0.25 tons per hour, venting inside and using no controls.

(g) One (1) Skinner, constructed in 1992, with maximum capacity of 0.5 tons per hour, venting inside and using no controls.

(h) Five (5) Bun Cutters, each with 0.325 tons/hr maximum capacity, venting inside and using no controls:

(i) Large Bun Cutter, constructed in 1991,
(ii) ST Mezzanine Bun Cutter, constructed in 1987,
(iii) ET Mezzanine Bun Cutter, constructed in 2001,
(iv) Small Bun Cutter, constructed in 2001, and
(v) Zapper Bun Cutter, constructed in 2008.

(i) Two (2) BSV Slitters, each with maximum capacity of 0.11 tons per hour, venting inside and using no controls:

(i) BSV1, constructed in 1991
(ii) BSV2, constructed in 2001

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

The source also consists of the following insignificant activities:
(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (cold cleaner degreasing operation with several remote solvent reservoirs).

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

(e) Six (6) felt presses, with no control:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Capacity (sheets per year)</th>
<th>Construction Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press FPA</td>
<td>131,400.0</td>
<td>2008</td>
</tr>
<tr>
<td>Press FPC</td>
<td>300,000.0</td>
<td>1998</td>
</tr>
<tr>
<td>Press FPD</td>
<td>300,000.0</td>
<td>2000</td>
</tr>
<tr>
<td>Press FPE</td>
<td>35.0</td>
<td>2003</td>
</tr>
<tr>
<td>Press FPF</td>
<td>12.0</td>
<td>2008</td>
</tr>
<tr>
<td>Press FPG</td>
<td>250,000.0</td>
<td>2016</td>
</tr>
</tbody>
</table>

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(g) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(h) Equipment used exclusively for the following:

(1) packaging lubricants and greases.

(2) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(j) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100ºF); or

(2) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20°C (68ºF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
(k) Closed loop heating and cooling systems.

(l) Radio frequency dryer on quencher system (water vapor emissions only).

(m) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Heat exchanger cleaning and repair.

(q) Process vessel degassing and cleaning to prepare for internal repairs.

(r) Paved and unpaved roads and parking lots with public access.

(s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(t) One (1) Natural Gas-fired Emergency Generator, identified as EG1, with a maximum rated capacity of 168.0 HP, manufactured in October 2006 an installed in November 2006.

(u) Other emergency equipment as follows: electric stationary fire pumps.

(v) Purge double block and bleed valves.

(w) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

(x) Ink handling and applications with VOC emissions less than 3 pounds per hour or 15 pounds per day.

(y) Thirty four (34) Storage tanks:

(1) Six (6) Amines storage tanks, with vapor pressure less than 3kpa.

(2) One (1) Fire retardant storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day.

(3) Six (6) TDI storage tanks, with vapor pressure less than 3kpa and equipped with activated carbon as control.

Under 40 CFR 63, Subpart III, these are considered existing facilities.

(4) One (1) MDI storage tank, with vapor pressure less than 3kpa.

Under 40 CFR 63, Subpart III, this is considered an existing facility.

(5) Seventeen (17) Polyol storage tanks, each with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, all constructed after 1984.

Under 40 CFR 63, Subpart III, this is considered an existing facility.
(6) One (1) VOC (N-ethylmorpholine) storage tank, with vapor pressure less than 3kpa.

Under 40 CFR 63, Subpart III, this is considered an existing facility.

(7) One (1) 20,000 gallon No. 2 fuel oil storage tank, with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, and constructed after 1984.

(8) One (1) 6,000 gallon storage tank containing an organic chemical blend (n-propyl bromide), with capacity of less than 75 cubic meters.

(z) Prep saws.

(aa) Two (2) Baumer loop slitters using an n-propyl bromide based adhesive, which contains less than 1% HAP.

(bb) Scrap bailers.

(cc) Horizontal slitters with no adhesive usage.

(dd) Two (2) dry raw material mix stations, constructed in 1996, with maximum capacity of 525 pounds per day, and using no controls.

(ee) Caustic Soda Quench System, with maximum capacity of 15 cubic feet soda/minute, and using no controls.

(ff) Spray adhesive application for aluminum foil, with maximum capacity of 2 cans per month with maximum content of 0.58 lbs of VOC per can, using no controls.

(gg) Laboratory emissions: Product test burning.

(hh) One (1) hot wire cutter, constructed in 1991, with maximum capacity of 0.175 tons per hour, venting inside and using no controls.

(ii) One (1) hot wire cutter, constructed in 2011, with maximum capacity of 0.963 tons per hour, venting inside and using no controls.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22); 

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability); 

(c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
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][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T003-40692-00225, 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 of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region 5
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 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 may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance
causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 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 within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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.

B.12 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 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.

(b) 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 shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable
requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) 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.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T003-40692-00225 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

B.14 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.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. 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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the
document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

(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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) 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.18 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 or notice 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.19 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) or (c) without a prior permit revision, if each of the following conditions is met:

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

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(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(37)) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(f) This condition does not apply to emission trades of SO2 or NOX under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee’s premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.22 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.23 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 within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) 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, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Opacity  [326 IAC 5-1]

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

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

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

C.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.

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

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

C.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 Fugitive Particulate Matter Emission Limitations  [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 Stack Height  [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.
C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
2. If there is a change in the following:
   A. Asbestos removal or demolition start date;
   B. Removal or demolition contractor; or
   C. Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to
thoroughly inspect the affected portion of the facility for the presence of asbestos. The
requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted
by the Permittee does not require a certification that meets the requirements of 326 IAC
2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days
prior to the actual test date. The notification submitted by the Permittee does not require
a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official"
as defined by 326 IAC 2-7-1(35).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]
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.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance
monitoring for new emission units shall be implemented on and after the date of initial
start-up.

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;
(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:
Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251  

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(yy)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.
Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

1. The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

2. The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

1. The name, address, and telephone number of the major stationary source.

2. The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

3. The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

4. Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.
Stratospheric Ozone Protection

C.19 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 applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

(a) One (1) Flexible Slabstock Polyurethane Foam Manufacturing Process (PL-01), producing a maximum of nine (9.0) million board feet per day of polyurethane foam, consisting of:

(1) One (1) Periphlex Pour Line with integral mix chamber PL-01a), constructed in 1968, with maximum usage of 69.0 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19).

(2) One (1) Polyurethane Foam Production Line with integral mix chamber (PL-01c), constructed in 2010, with maximum usage of 80.80 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting to five (5) stacks (ID Nos. 60-64).


Under 40 CFR 63, Subpart III, this is considered an existing facility.

(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 (VOC) [326 IAC 2-2-3][326 IAC 8-1-6]

Pursuant to 326 IAC 2-2-3 BACT, 326 IAC 8-1-6 BACT and SSM 003-29260-00225, issued on November 8, 2010, the Permittee shall comply with the following for polyurethane foam production line (PL-01c):

(a) The input of VOC to the polyurethane foam production line (PL-01c) line shall not exceed 80.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The Permittee shall utilize the following best management practices to minimize VOC emissions from polyurethane foam production line (PL-01c):

(1) Use of the lowest VOC-content foam production materials where technically feasible;

(2) Track the quantity of amine catalyst used on a monthly basis;

(3) Store and handle the amine catalyst to minimize fugitive losses; and

(4) Continue to explore options for the production of foam using non-VOC content materials.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)][326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance.
plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

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

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

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records of the type and quantity of VOC-containing catalyst used at polyurethane foam production line (PL-01c). Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.1(a).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

(b) One (1) Natural Gas-fired Flame Laminator Machine (ID No. FL-02), constructed in 1995, with a maximum capacity of 40,000 square feet per hour with a process weight rate of 1 ton per hour, with a heat input capacity of 0.35 MMBtu/hr, using no controls and exhausting through two (2) stacks (ID Nos. 02-002 and FL2).

Under 40 CFR 63, Subpart MMMMM, this is considered an existing facility.

(c) One (1) Thermal Reticulation Unit (ID No. TRU-01), constructed in 1968 and modified in 2007, with a maximum throughput of 87,000 cycles per year, using no controls and exhausting through nine (9) stacks (ID Nos. 35-43).

(d) One (1) Thermal Reticulation Unit (ID No.: TRU-02), constructed in 2007, with a maximum throughput of 87,600 cycles per year, using no controls and exhausting through eight (8) stacks (ID Nos.: 52-59).

(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 Volatile Organic Compounds [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

(a) The laminated foam production rate for the natural gas flame laminator machine (FL-02) shall not exceed 166,000,000 square feet per 12 consecutive month period with compliance determined at the end of each month.

(b) VOC emission from natural gas flame laminator machine (FL-02) shall not exceed 0.0003 pounds per square foot of laminated foam produced.

Compliance with these limits will limit the VOC PTE of natural gas flame laminator machine (FL-02) to less than 25 tons per 12 consecutive month period, and therefore the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply to the natural gas flame laminator machine (FL-02).

D.2.2 Volatile Organic Compounds [326 IAC 8-1-6][326 IAC 2-4.1-1]

(a) Pursuant to 326 IAC 8-1-6 BACT and 326 IAC 2-4.1-1 MACT and SSM 003-25183-00225, issued on December 18, 2007, the Permittee shall comply with the following for thermal reticulation unit (TRU-02):

(1) Maintain the thermal reticulation unit in good working order.

(2) Utilize quality procedures to minimize VOC emissions from this unit. The work practices to be performed on the thermal reticulation unit include the following inspection and preventive maintenance procedures:

(A) The following preventive maintenance procedures shall be performed on the thermal reticulation unit door.

(i) Grease chamber door gear boxes

(ii) Grease nonpolymer door linkages. (May possibly be converted to
(B) The following preventive maintenance procedures shall be performed on the thermal reticulation unit:

(i) On an annual basis, remove and replace roof hydrogen and oxygen valves.
(ii) Per quality standard, replace floor level hydrogen and oxygen valves.

(C) The following inspections shall be done on the thermal reticulation unit.

(i) Check vacuum time and adjust if necessary.
(ii) Fuel pressure check/TPM fuel fill calibration.

(D) The thermal reticulation unit Nash pump shall be lubricated.

(i) Grease lube points per quality standard.

(E) The following preventive maintenance procedures shall be performed on the thermal reticulation unit mechanical vacuum system on a daily basis:

(i) Drain the condensed water from the exhaust line into the bucket.
(ii) Check the oil level through the side sight glass.
(iii) Check for oil flow (sight glass with white ball).
(iv) Empty condensate bucket as needed.
(v) Check mechanical blower oil level and add as needed.
(vi) Check the oil purifier as follows: Check gauge for proper pressure between (20-25 psi). When the purifier pressure exceeds 40 psi, service the unit.

(F) The following preventive maintenance procedures shall be performed on the Stokes pumps per preventive maintenance frequency:

(i) Drain oil, remove side cover.
(ii) Remove baffle, remove valves.
(iii) Wipe inside of chamber to remove residue.
(iv) Install new or rebuilt valves.
(v) Clean baffle and reinstall.
(vi) Install side cover with new gasket, if needed.
(vii) Refill with oil.
(viii) Check V-belts for wear and proper tension, replace if needed.
(ix) Check gas ballast valves, replace if needed.
(x) Perform preventive maintenance on unit oil purifier per preventative maintenance specification.

(G) The following preventive maintenance procedures shall be performed on the mechanical blower per preventive maintenance specification:

(i) Change air filter.
(ii) Check for water leaks.
(iii) Check V-belts.

(H) The following preventive maintenance procedures shall be performed on the chamber pressure transducer per preventive maintenance specification:
(i) Remove manometer valve.
(ii) Install new or rebuilt valve.
(iii) Rebuild, tag and stock valve.
(iv) Check calibration of chamber pressure transducer per preventive maintenance specification.

(I) The following preventive maintenance procedures shall be performed on the shot pins per preventive maintenance frequency:

(i) Check shot pin hydraulic cylinder mount for broken or loose bolts.
(ii) Check shot pin hydraulic cylinder assembly plates for torque to chamber.
(iii) Check shot pin limit switch mounting bolts for tightness.

(J) The following preventive maintenance procedures shall be performed on the Nash water heat exchanger per preventive maintenance specification:

(i) Open, clean and flush all tubes.

(K) Perform fuel fill alarm preventive maintenance monthly per preventive maintenance specification.

(L) Perform flammable fuel detector preventive maintenance per preventive maintenance specification

(M) Perform preventive maintenance procedure on plug purge system per preventive maintenance specification:

(i) Replace the plug purge valve.
(ii) Rebuild, tag and stock valve.
(iii) Replace flame arrestor.
(iv) Replace plug block.
(v) Clean and stock plug block.

(N) Perform thermal reticulation unit cleaning procedure dictated by production schedule:

(i) Perform clean type per schedule.
(ii) Complete checklist per clean type.

(O) Perform preventive maintenance procedures on the thermal reticulation unit hydraulic system per quality control specifications:

(i) Perform oil analysis to determine replacement timing
(ii) Maintain fluid level.
(iii) Maintain filter.
D.2.3 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 facility listed in the table below are as follows:

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Emission Limit (lbs PM/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural gas flame laminator machine (FL-02)</td>
<td>1.0</td>
<td>4.1</td>
</tr>
</tbody>
</table>

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:

\[ E = 4.10 \times P^{0.67} \]

where \( E \) = rate of emission in pounds per hour; and

\( P \) = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall perform VOC testing on natural gas flame laminator machine (FL-02) not later than five (5) years of the most recent testing. The testing shall be performed utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.6 Record Keeping Requirements
(a) To document the compliance status with Condition D.2.1(a), the Permittee shall maintain a record of the total production of laminated foam per month in square feet for the natural gas flame laminator machine (FL-02). Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the production limit established in Condition D.2.1(a).

(b) To document the compliance status with Condition D.2.2, the Permittee shall maintain records of work practice standard activities performed for thermal reticulation unit (TRU-02).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.7 Reporting Requirements
A quarterly summary of the information to document the compliance status with Condition D.2.1(a)
shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

(e) Two (2) Natural Gas-fired Boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each with a maximum heat input capacity of 14.60 MMBtu/hr, using No. 2 distillate fuel oil as back-up fuel for maintenance/testing/training purpose up to 48 hours per year or during periods of gas curtailment or supply interruptions, using no controls and each exhausting through one (1) stack (ID Nos. 45 and 46).

Under 40 CFR 63, Subpart DDDDD, these are considered existing facilities.

(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.3.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) the PM emissions from each natural gas fired boilers (IPB-01 and IPB-02) shall be limited to 0.73 pounds per MMBtu heat input.

This limitation is based on the following equation:

\[ \text{Pt} = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \]

where

\( C = 50 \text{ u/m}^3 \)
\( \text{Pt} = \text{emission rate limit (lbs/MMBtu)} \)
\( Q = \text{total source heat input capacity (MMBtu/hr)} (29.2 \text{ MMBtu/hr}) \)
\( N = \text{number of stacks (2)} \)
\( a = \text{plume rise factor (0.67)} \)
\( h = \text{stack height (ft) (25)} \)

D.3.2 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1][326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations), the SO2 emission rate from each natural gas fired boilers (IPB-01 and IPB-02) shall not exceed five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 distillate fuel oil.

Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.3.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.3.2 shall be determined using one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the limit specified in Condition D.3.2 by:
(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or,

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers (ID Nos. IPB-01 and IPB-02), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.3.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
### SECTION D.4  EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Facility Description [326 IAC 2-7-5(15)]:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(f) One (1) Felter (FPB), constructed in 1993, with maximum capacity of 0.25 tons per hour, venting inside and using no controls.</td>
</tr>
<tr>
<td>(g) One (1) Skinner, constructed in 1992, with maximum capacity of 0.5 tons per hour, venting inside and using no controls.</td>
</tr>
<tr>
<td>(h) Five (5) Bun Cutters, each with 0.325 tons/hr maximum capacity, venting inside and using no controls:</td>
</tr>
<tr>
<td>(i) Large Bun Cutter, constructed in 1991,</td>
</tr>
<tr>
<td>(ii) ST Mezzanine Bun Cutter, constructed in 1987,</td>
</tr>
<tr>
<td>(iii) ET Mezzanine Bun Cutter, constructed in 2001,</td>
</tr>
<tr>
<td>(iv) Small Bun Cutter, constructed in 2001, and</td>
</tr>
<tr>
<td>(v) Zapper Bun Cutter, constructed in 2008.</td>
</tr>
<tr>
<td>(i) Two (2) BSV Slitters, each with maximum capacity of 0.11 tons per hour, venting inside and using no controls:</td>
</tr>
<tr>
<td>(i) BSV1, constructed in 1991</td>
</tr>
<tr>
<td>(ii) BSV2, constructed in 2001</td>
</tr>
</tbody>
</table>

### Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (cold cleaner degreasing operation with several remote solvent reservoirs).

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

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

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following for degreasing operations:

1. Equip the degreaser with a cover.
2. Equip the degreaser with a device for draining cleaned parts.
3. Close the degreaser cover whenever parts are not being handled in the
degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall comply with the following for degreasing operations:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

   (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

   (B) A water cover when solvent used is insoluble in, and heavier than, water.

   (C) A refrigerated chiller.

   (D) Carbon adsorption.

   (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

   (A) must be a solid, fluid stream; and

   (B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-8(b), on and after January 1, 2015, the Permittee shall not operate Degreasing operations with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Pursuant to 326 IAC 8-3-8(c), on and after January 1, 2015, the Permittee shall maintain each of the following records for each solvent purchase for the Degreasing operations:
(A) The name and address of the solvent supplier.
(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).
(C) The type of solvent purchased.
(D) The total volume of the solvent purchased.
(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) Pursuant to 326 IAC 8-3-8(d), all the records specified in paragraph (b) above shall be retained on-site or accessible electronically from the site for the most recent three (3) year period, and reasonably accessible for an additional two (2) year period.

D.4.3 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below shall be as follows:

<table>
<thead>
<tr>
<th>Facility</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Emission Limit (lbs PM/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Felter (FPB)</td>
<td>0.25</td>
<td>1.62</td>
</tr>
<tr>
<td>Skinner</td>
<td>0.50</td>
<td>2.58</td>
</tr>
<tr>
<td>Large Bun Cutter</td>
<td>0.325</td>
<td>1.93</td>
</tr>
<tr>
<td>ST Mezzanine Bun Cutter</td>
<td>0.325</td>
<td>1.93</td>
</tr>
<tr>
<td>ET Mezzanine Bun Cutter</td>
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<td>1.93</td>
</tr>
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<td>Small Bun Cutter</td>
<td>0.325</td>
<td>1.93</td>
</tr>
<tr>
<td>Zapper Bun Cutter</td>
<td>0.325</td>
<td>1.93</td>
</tr>
<tr>
<td>Slitter (BSV1)</td>
<td>0.11</td>
<td>0.93</td>
</tr>
<tr>
<td>Slitter (BSV2)</td>
<td>0.11</td>
<td>0.93</td>
</tr>
</tbody>
</table>

The pounds per hour limitations in the table above were calculated with the following equations:

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

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the following insignificant activities, each, with a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(ii) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(iii) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the
following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
SECTION E.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) Flexible Slabstock Polyurethane Foam Manufacturing Process (PL-01), producing a maximum of nine (9.0) million board feet per day of polyurethane foam, consisting of:

(1) One (1) Periphlex Pour Line with integral mix chamber PL-01a), constructed in 1968, with maximum usage of 69.0 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19).

(2) One (1) Polyurethane Foam Production Line with integral mix chamber (PL-01c), constructed in 2010, with maximum usage of 80.80 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting to five (5) stacks (ID Nos. 60-64).


Under 40 CFR 63, Subpart III, this is considered an existing facility.

Insignificant Activities

(y) Thirty four (34) Storage tanks:

(1) Six (6) Amines storage tanks, with vapor pressure less than 3kpa.

(2) One (1) Fire retardant storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day.

(3) Six (6) TDI storage tanks, with vapor pressure less than 3kpa and equipped with activated carbon as control.

Under 40 CFR 63, Subpart III, these are considered existing facilities.

(4) One (1) MDI storage tank, with vapor pressure less than 3kpa.

Under 40 CFR 63, Subpart III, this is considered an existing facility.

(5) Seventeen (17) Polyol storage tanks, each with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, all constructed after 1984.

Under 40 CFR 63, Subpart III, this is considered an existing facility.

(6) One (1) VOC (N-ethylmorpholine) storage tank, with vapor pressure less than 3kpa.

Under 40 CFR 63, Subpart III, this is considered an existing facility.
(7) One (1) 20,000 gallon No. 2 fuel oil storage tank, with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, and constructed after 1984.

(8) One (1) 6,000 gallon storage tank containing an organic chemical blend (n-propyl bromide), with capacity of less than 75 cubic meters.

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

Nation Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1 for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart III.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Flexible Polyurethane Foam Production [40 CFR Part 63, Subpart III][326 IAC 20-22]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart III (included as Attachment A to this permit), which are incorporated by reference as 326 IAC 20-22, for the emission units listed above:

(1) 40 CFR 63.1290(a) and (b)
(2) 40 CFR 63.1291(a)
(3) 40 CFR 63.1292
(4) 40 CFR 63.1293
(5) 40 CFR 63.1294(a), (b), (c), (d)
(6) 40 CFR 63.1303(a), (b)
(7) 40 CFR 63.1306 (a), (b), (c), (d)(1), (d)(2), (e), (f)
(8) 40 CFR 63.1307 (except (a)(2), (b)(1), (c), (d), (e))
(9) 40 CFR 63.1308 (a), (b), (c), (d)(1), (d)(4)
(10) 40 CFR 63.1309 (a), (b), (c)
(11) Table 1
SECTION E.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) Natural Gas-fired Flame Laminator Machine (ID No. FL-02), constructed in 1995, with a maximum capacity of 40,000 square feet per hour with a process weight rate of 1 ton per hour, with a heat input capacity of 0.35 MMBtu/hr, using no controls and exhausting through two (2) stacks (ID Nos. 02-002 and FL2).

Under 40 CFR 63, Subpart MMMMM, this is considered an existing facility.

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

Nation Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1 for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMMM.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 Flexible Polyurethane Foam Fabrication Operations [40 CFR Part 63, Subpart MMMMM][326 IAC 20-66]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMMMM (included as Attachment B to this permit), which are incorporated by reference as 326 IAC 20-66, for the emission unit listed above:

(1) 40 CFR 63.8760
(2) 40 CFR 63.8782(except (d)(2))
(3) 40 CFR 63.8784 (except (c), (d), (e))
(4) 40 CFR 63.8794(c), (g)
(5) 40 CFR 63.8816(b)
(6) 40 CFR 63.8820(a)
(7) 40 CFR 63.8822
(8) 40 CFR 63.8826
(9) 40 CFR 63.8828
(10) 40 CFR 63.8830
(11) Table 1 and 7
SECTION E.3 FACILITY OPERATION CONDITIONS

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

(e) Two (2) Natural Gas-fired Boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each with a maximum heat input capacity of 14.60 MMBtu/hr, using No. 2 distillate fuel oil as back-up fuel for maintenance/testing/training purpose up to 48 hours per year or during periods of gas curtailment or supply interruptions, using no controls and each exhausting through one (1) stack (ID Nos. 45 and 46).

Under 40 CFR 63, Subpart DDDDD, these are considered existing facilities.

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

Nation Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1 for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment AC to this permit), which are incorporated by reference as 326 IAC 20-95, for the emission unit listed above:

(1) 40 CFR 63.7480
(2) 40 CFR 63.7490
(3) 40 CFR 63.7495
(4) 40 CFR 63.7500(a)(1)&(3), (e) & (f)
(5) 40 CFR 63.7505(a)
(6) 40 CFR 63.7510(e)
(7) 40 CFR 63.7515(d) & (g)
(8) 40 CFR 63.7530(d) & (e)
(9) 40 CFR 63.7540(a)(10),(12)&(13)
(10) 40 CFR 63.7545(a),(b),(e),(f)&(h)
(11) 40 CFR 63.7550(a)-(c)&(h)
(12) 40 CFR 63.7555(a)&(h)-(j)
(13) 40 CFR 63.7560
(14) 40 CFR 63.7565
(15) 40 CFR 63.7570
(16) 40 CFR 63.7575
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: FXI Inc.
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Part 70 Permit No.: T003-40692-00225

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)
☐ Report (specify)
☐ Notification (specify)
☐ Affidavit (specify)
☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:
PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT

Source Name:   FXI Inc.  
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809  
Part 70 Permit No.: T003-40692-00225

This form consists of 2 pages       Page 1 of 2

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

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Control Equipment:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Condition or Operation Limitation in Permit:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description of the Emergency:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Describe the cause of the Emergency:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>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:</td>
</tr>
</tbody>
</table>

Form Completed by: ______________________________

Title / Position: ______________________________

Date: ______________________________

Phone: ______________________________
## Part 70 Usage Report

(Submit Report Quarterly)

### Source Information
- **Source Name:** FXI Inc.
- **Source Address:** 3005 Commercial Road, Fort Wayne, Indiana 46809
- **Part 70 Permit No.:** T003-40692-00225

### Facility and Parameter
- **Facility:** Polyurethane foam production line (PL-01c)
- **Parameter:** VOC Input
- **Limit:** Shall not exceed 80.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

### Quarterly Report

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>VOC Input this month (tons)</td>
<td>VOC Input the previous eleven (11) months (tons)</td>
<td>12 Month Total VOC Input (tons)</td>
</tr>
</tbody>
</table>

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

Part 70 Quarterly Report  

Source Name: FXI Inc.  
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809  
Part 70 Permit No.: T003-40692-00225  
Facility: Natural gas flame laminator machine (FL-02)  
Parameter: Laminated foam production rate for the flame laminator FL-02  
Limit: Shall not exceed 166,000,000 square feet per 12 consecutive month period

QUARTER: ________________  YEAR: ________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ____________________________________________  
Title / Position: ___________________________________________  
Signature: ________________________________________________  
Date: _____________________________________________________  
Phone: ____________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: FXI Inc.
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Part 70 Permit No.: T003-40692-00225

Months: _________ to _________ Year: ____________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
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<th>Permit Requirement (specify permit condition #)</th>
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<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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<tr>
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<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

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</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ______________________________

Title / Position: ______________________________

Date: ______________________________

Phone: ______________________________
Indiana Department of Environmental Management
Office of Air Quality

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

### Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>FXI, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>3005 Commercial Road, Fort Wayne, Indiana 46809</td>
</tr>
<tr>
<td>County:</td>
<td>Allen</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3086 (Plastic Foam Products)</td>
</tr>
<tr>
<td>Permit Renewal No.:</td>
<td>T003-40692-00225</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Nicholas Walters</td>
</tr>
</tbody>
</table>

On November 13, 2018, FXI, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from FXI, Inc. relating to the operation of a stationary flexible polyurethane or rebond foam production and processing plant. FXI, Inc. was issued its Part 70 Operating Permit Renewal (T003-33748-00225) on August 20, 2014.

### Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T003-33748-00225 on August 20, 2014. The source has since received the following approvals:

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Permit Number</th>
<th>Issuance Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative Amendment</td>
<td>003-37506-00225</td>
<td>September 30, 2016</td>
</tr>
<tr>
<td>Administrative Amendment</td>
<td>003-37743-00225</td>
<td>October 31, 2016</td>
</tr>
</tbody>
</table>

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) Flexible Slabstock Polyurethane Foam Manufacturing Process (PL-01), producing a maximum of nine (9.0) million board feet per day of polyurethane foam, consisting of:

1. One (1) Periphlex Pour Line with integral mix chamber PL-01a), constructed in 1968, with maximum usage of 69.0 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19).

2. One (1) Polyurethane Foam Production Line with integral mix chamber (PL-01c), constructed in 2010, with maximum usage of 80.80 tons of amine catalyst per year and not using blowing agent, using no controls and exhausting to five (5) stacks (ID Nos. 60-64).

Under 40 CFR 63, Subpart III, this is considered an existing facility.

(b) One (1) Natural Gas-fired Flame Laminator Machine (ID No. FL-02), constructed in 1995, with a maximum capacity of 40,000 square feet per hour with a process weight rate of 1 ton per hour, with a heat input capacity of 0.35 MMBtu/hr, using no controls and exhausting through two (2) stacks (ID Nos. 02-002 and FL2).

Under 40 CFR 63, Subpart MMMMM, this is considered an existing facility.

(c) One (1) Thermal Reticulation Unit (ID No. TRU-01), constructed in 1968 and modified in 2007, with a maximum throughput of 87,000 cycles per year, using no controls and exhausting through nine (9) stacks (ID Nos. 35-43).

(d) One (1) Thermal Reticulation Unit (ID No.: TRU-02), constructed in 2007, with a maximum throughput of 87,600 cycles per year, using no controls and exhausting through eight (8) stacks (ID Nos.: 52-59).

(e) Two (2) Natural Gas-fired Boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each with a maximum heat input capacity of 14.60 MMBtu/hr, using No. 2 distillate fuel oil as back-up fuel for maintenance/testing/training purpose up to 48 hours per year or during periods of gas curtailment or supply interruptions, using no controls and each exhausting through one (1) stack (ID Nos. 45 and 46).

Under 40 CFR 63, Subpart DDDDD, these are considered existing facilities.

(f) One (1) Felter (FPB), constructed in 1993, with maximum capacity of 0.25 tons per hour, venting inside and using no controls.

(g) One (1) Skinner, constructed in 1992, with maximum capacity of 0.5 tons per hour, venting inside and using no controls.

(h) Five (5) Bun Cutters, each with 0.325 tons/hr maximum capacity, venting inside and using no controls:

(i) Large Bun Cutter, constructed in 1991,
(ii) ST Mezzanine Bun Cutter, constructed in 1987,
(iii) ET Mezzanine Bun Cutter, constructed in 2001,
(iv) Small Bun Cutter, constructed in 2001, and
(v) Zapper Bun Cutter, constructed in 2008.

(i) Two (2) BSV Slitters, each with maximum capacity of 0.11 tons per hour, venting inside and using no controls:

(i) BSV1, constructed in 1991
(ii) BSV2, constructed in 2001
Insignificant Activities

The source also consists of the following insignificant activities:

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (cold cleaner degreasing operation with several remote solvent reservoirs).

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

(e) Six (6) felt presses, with no control:

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Capacity (sheets per year)</th>
<th>Construction Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Press FPA</td>
<td>131,400.0</td>
<td>2008</td>
</tr>
<tr>
<td>Press FPC</td>
<td>300,000.0</td>
<td>1998</td>
</tr>
<tr>
<td>Press FPD</td>
<td>300,000.0</td>
<td>2000</td>
</tr>
<tr>
<td>Press FPE</td>
<td>35.0</td>
<td>2003</td>
</tr>
<tr>
<td>Press FPF</td>
<td>12.0</td>
<td>2008</td>
</tr>
<tr>
<td>Press FPG</td>
<td>250,000.0</td>
<td>2016</td>
</tr>
</tbody>
</table>

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(g) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(h) Equipment used exclusively for the following:

(1) packaging lubricants and greases.

(2) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(j) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100ºF); or

(2) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20ºC (68ºF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
(k) Closed loop heating and cooling systems.

(l) Radio frequency dryer on quencher system (water vapor emissions only).

(m) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(n) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Heat exchanger cleaning and repair.

(q) Process vessel degassing and cleaning to prepare for internal repairs.

(r) Paved and unpaved roads and parking lots with public access.

(s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(t) One (1) Natural Gas-fired Emergency Generator, identified as EG1, with a maximum rated capacity of 168.0 HP, manufactured in October 2006 an installed in November 2006.

(u) Other emergency equipment as follows: electric stationary fire pumps.

(v) Purge double block and bleed valves.

(w) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

(x) Ink handling and applications with VOC emissions less than 3 pounds per hour or 15 pounds per day.

(y) Thirty four (34) Storage tanks:

(1) Six (6) Amines storage tanks, with vapor pressure less than 3kpa.

(2) One (1) Fire retardant storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day.

(3) Six (6) TDI storage tanks, with vapor pressure less than 3kpa and equipped with activated carbon as control.

   Under 40 CFR 63, Subpart III, these are considered existing facilities.

(4) One (1) MDI storage tank, with vapor pressure less than 3kpa.

   Under 40 CFR 63, Subpart III, this is considered an existing facility.

(5) Seventeen (17) Polyol storage tanks, each with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, all constructed after 1984.

   Under 40 CFR 63, Subpart III, this is considered an existing facility.

(6) One (1) VOC (N-ethylmorpholine) storage tank, with vapor pressure less than 3kpa.

   Under 40 CFR 63, Subpart III, this is considered an existing facility.
(7) One (1) 20,000 gallon No. 2 fuel oil storage tank, with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, and constructed after 1984.

(8) One (1) 6,000 gallon storage tank containing an organic chemical blend (n-propyl bromide), with capacity of less than 75 cubic meters.

(z) Prep saws.

(aa) Two (2) Baumer loop slitters using an n-propyl bromide based adhesive, which contains less than 1% HAP.

(bb) Scrap bailers.

(cc) Horizontal slitters with no adhesive usage.

(dd) Two (2) dry raw material mix stations, constructed in 1996, with maximum capacity of 525 pounds per day, and using no controls.

(ee) Caustic Soda Quench System, with maximum capacity of 15 cubic feet soda/minute, and using no controls.

(ff) Spray adhesive application for aluminum foil, with maximum capacity of 2 cans per month with maximum content of 0.58 lbs of VOC per can, using no controls.

(gg) Laboratory emissions: Product test burning.

(hh) One (1) hot wire cutter, constructed in 1991, with maximum capacity of 0.175 tons per hour, venting inside and using no controls.

(ii) One (1) hot wire cutter, constructed in 2011, with maximum capacity of 0.963 tons per hour, venting inside and using no controls.

<table>
<thead>
<tr>
<th>Enforcement Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>There are no enforcement actions pending.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Calculations</th>
</tr>
</thead>
<tbody>
<tr>
<td>See Appendix A of this Technical Support Document for detailed emission calculations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>County Attainment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>The source is located in Allen County.</td>
</tr>
</tbody>
</table>
(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Allen County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Allen County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO$_2$</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O$_3$</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM$_{2.5}$ standard.</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM$_{2.5}$ standard.</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>Unclassifiable effective November 15, 1990</td>
</tr>
<tr>
<td>NO$_2$</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO$_2$ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

Fugitive Emissions
Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions
On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”
The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀²</th>
<th>PM₂₅³,₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>82.15</td>
<td>82.90</td>
<td>82.67</td>
<td>64.97</td>
<td>26.56</td>
<td>327.91</td>
<td>89.47</td>
<td>50.81</td>
<td>109.80</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
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</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant.”
²PM₂₅ listed is direct PM₂₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source will be issued a Part 70 Operating Permit Renewal.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met 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.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.
### Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)

<table>
<thead>
<tr>
<th></th>
<th>PM(^1)</th>
<th>PM(_{10})(^1)</th>
<th>PM(_{2.5})(^{1,2})</th>
<th>SO(_2)</th>
<th>NO(_X)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions(^*)</td>
<td>82.15</td>
<td>82.90</td>
<td>82.67</td>
<td>64.97</td>
<td>26.56</td>
<td>327.91</td>
<td>89.47</td>
<td>50.81</td>
<td>109.80</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^3\)Single highest source-wide HAP.

\(^*\)Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, VOC, is emitted at a rate of 100 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

#### Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Standards of Performance for Fossil-Fuel-Fired Steam Generators 40 CFR 60, Subpart D and 326 IAC 12, are not included in the permit for boilers IPB-01 and IPIB-02, because they were constructed before August 17, 1971.

(b) The requirements of the New Source Performance Standard for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Db and 326 IAC 12, are not included in the permit for boilers IPB-01 and IPIB-02, because they were constructed before June 19, 1984.

(c) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for boilers IPB-01 and IPIB-02, because they were constructed before June 9, 1989.

(d) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60, Subpart K and 326 IAC 12, are not included in the permit for the No. 2 Fuel Oil Storage Tank, because the No. 2 Fuel Oil Storage Tank was constructed after May 19, 1978.

(e) The requirements of the New Source Performance Standard for Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60, Subpart Ka and 326 IAC 12, are not included in the permit for the No. 2 Fuel Oil Storage Tank, because the No. 2 Fuel Oil Storage Tank was constructed after July 23, 1984.
The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the following units:

<table>
<thead>
<tr>
<th>Unit</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amines storage tanks</td>
<td>vapor pressure less than 3kpa</td>
</tr>
<tr>
<td>TDI storage tanks</td>
<td>vapor pressure less than 3kpa</td>
</tr>
<tr>
<td>MDI storage tank</td>
<td>vapor pressure less than 3kpa</td>
</tr>
<tr>
<td>Polyol storage tanks</td>
<td>each tank has capacity between 75 and 151 m³ but maximum true vapor pressure of less than 15 kPa.</td>
</tr>
<tr>
<td>VOC (N-ethylmorpholine) storage tank</td>
<td>vapor pressure less than 3kpa</td>
</tr>
<tr>
<td>No. 2 fuel oil storage tank</td>
<td>capacity between 75 and 151 m³ but maximum true vapor pressure of less than 15 kPa.</td>
</tr>
<tr>
<td>Organic chemical blend storage tank</td>
<td>capacity of less than 75 cubic meters (19,813 gallons)</td>
</tr>
<tr>
<td>VOC and HAP storage containers</td>
<td>capacity of less than 75 cubic meters (19,813 gallons)</td>
</tr>
</tbody>
</table>

The requirements of the New Source Performance Standard for Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60, Subpart III and 326 IAC 12, are not included in the permit for the Natural Gas-fired Emergency Generator (EG1), because the Natural Gas-fired Emergency Generator (EG1) is not a compression ignition engine.

The requirements of the New Source Performance Standard for Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ and 326 IAC 12, are not included in the permit for the Natural Gas Emergency Generator EG1, because the unit was manufactured prior to January 1, 2009, the date specified in 40 CFR 60.4230(a)(4)(iv).

There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T are not included in the permit since halogenated HAPs cleaning solvent are not used for the degreasing operations.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production 40 CFR 63, Subpart III, which is incorporated by reference as 326 IAC 20-22, because this source produces flexible polyurethane or rebond foam, emits a HAP, and is a major source of HAPs. The compliance date for this source is October 8, 2001. The units subject to this rule include the following:

(1) One (1) flexible slabstock polyurethane foam manufacturing process (ID No. PL-01), producing a maximum of nine (9) million board feet per day of polyurethane foam, consisting of:

(a) One (1) periphlex pour line with integral mix chamber (PL-01a), with maximum usage of 69 tons of amine catalyst per year and not using blowing agent, constructed in 1968, without control and exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19).

(b) One (1) polyurethane foam production line with integral mix chamber (PL-01c), with maximum usage of 80.80 tons of amine catalyst per year and not using blowing agent, constructed in 2010, without control and exhausting to five (5) stacks (ID Nos. 60-64).
(c) Three (3) foam bun storage areas (Carpet Underlay Mezzanine Bun Grabber Area, South Finishing Mezzanine Bun Grabber Area, and the Loaf Stacker Area), all constructed in 1986, without control and exhausting through fourteen (14) stacks (ID Nos. 13-15, 17, 18, 20, 27-33, and 49).

Under 40 CFR 63, Subpart III, this is considered an existing facility.

Insignificant Activities Storage tanks:

(3) Six (6) TDI storage tanks, with vapor pressure less than 3kpa and equipped with activated carbon as control.

(4) One (1) MDI storage tank, with vapor pressure less than 3kpa.

(5) Seventeen (17) Polyol storage tanks, each with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, all constructed after 1984.

(6) One (1) VOC (N-ethylmorpholine) storage tank, with vapor pressure less than 3kpa

(7) One (1) 20,000 gallon No. 2 fuel oil storage tank, with capacity less than 151 cubic meters, vapor pressure of less than 15 kPa, and constructed after 1984.

(8) One (1) 6,000 gallon storage tank containing an organic chemical blend (n-propyl bromide), with capacity of less than 75 cubic meters.

This source is subject to the following portions of Subpart III:

(1) 40 CFR 63.1290(a) and (b)
(2) 40 CFR 63.1291(a)
(3) 40 CFR 63.1292
(4) 40 CFR 63.1293
(5) 40 CFR 63.1294(a), (b), (c), (d)
(6) 40 CFR 63.1303(a), (b)
(7) 40 CFR 63.1306 (a), (b), (c), (d)(1), (d)(2), (e), (f)
(8) 40 CFR 63.1307 (except (a)(2), (b)(1), (c), (d), (e))
(9) 40 CFR 63.1308 (a), (b), (c), (d)(1), (d)(4)
(10) 40 CFR 63.1309 (a), (b), (c)
(11) Table 1

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

This is an existing applicable requirement.

Since the above listed emission units are not equipped with add-on control to comply with this NESHAP, no performance test is required for these emission units under this NESHAP.

(c) The natural gas emergency generator (168 HP) (EG1) is subject to the requirements of 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (326 IAC 20-82), because it was manufactured in October 2006 and installed at the source in November 2006, so it is considered new under this NESHAP as defined in 40 CFR 63.6590(a)(2).

Pursuant to 40 CFR 63.6590(c)(3), this engine must meet the requirements of this NESHAP by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines. No further requirements apply to this engine under this NESHAP.
Note: Although this NESHAP refers to 40 CFR Part 60, Subpart JJJJ; no requirements are specified for Emergency Generator (NG Fired) in 40 CFR part 60 subpart JJJJ.

(d) The natural gas fired boilers (IPB-01 and IPB-02) is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD, which is incorporated by reference as IAC 20-92, because these boilers are located at a major source of HAP. The units subject to this rule include the following:

(1) Two (2) natural gas fired boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each rated at 14.6 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel for maintenance/testing/training purpose up to 48 hours per year or during periods of gas curtailment or supply interruptions, without control and each exhausting through one (1) stack (ID Nos. 45 and 46).

This emission unit is subject to the following portions of Subpart letter(s):

1. 40 CFR 63.7480
2. 40 CFR 63.7490
3. 40 CFR 63.7495
4. 40 CFR 63.7500(a)(1)&(3), (e) & (f)
5. 40 CFR 63.7505(a)
6. 40 CFR 63.7510(e)
7. 40 CFR 63.7515(d) & (g)
8. 40 CFR 63.7530(d) & (e)
9. 40 CFR 63.7540(a)(10),(12)&(13)
10. 40 CFR 63.7545(a),(b),(e),(f)&(h)
11. 40 CFR 63.7550(a)-(c)&(h)
12. 40 CFR 63.7555(a)&(h)-(j)
13. 40 CFR 63.7560
14. 40 CFR 63.7565
15. 40 CFR 63.7570
16. 40 CFR 63.7575

Since the natural gas fired boilers (IPB-01 and IPB-02) are not equipped with add-on control to comply with this NESHAP, no performance test is required for these emission units under this NESHAP.

The requirements of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1, apply to the natural gas fired boilers (IPB-01 and IPB-02) except as otherwise specified in 40 CFR 63, Subpart DDDDD.

(e) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63, Subpart MMMMM, which is incorporated by reference as 326 IAC 20-66, because loop slitting operations (using HAP based adhesive) and flame lamination operations are performed (for the fabrication of flexible polyurethane foam) at this source which is considered as a major source of HAPs. The compliance date for this source is April 14, 2003. The units subject to this rule include the following:

(1) Baumer loop slitters

Although this source operates two (2) Baumer loop slitters, they are not considered as an affected loop slitter source due to following reason:

Pursuant 40 CFR 63.8830, HAP-based adhesive is defined as an adhesive which contains 5% by weight or more of a HAP. The n-propyl bromide based adhesive that is
used in the Baumer loop slitters at this source contains less than 1% of any HAP. Therefore, the Baumer loop slitters are not considered as an affected loop slitter source, as defined under 40 CFR 63.8784(b)(1).

(2) Natural gas flame laminator machine (FL-02)
The specific facility that is subject to this NESHAP is the natural gas flame laminator machine (FL-02).

Under this NESHAP, the natural gas flame laminator machine (FL-02) is considered existing flame lamination affected source. Nonapplicable portions of the NESHAP will not be included in the permit.

This natural gas flame laminator machine (FL-02) is subject to the following portions of 40 CFR 63, Subpart MMMMM:

(1) 40 CFR 63.8760
(2) 40 CFR 63.8782(except (d)(2))
(3) 40 CFR 63.8784 (except (c), (d), (e))
(4) 40 CFR 63.8794(c), (g)
(5) 40 CFR 63.8816(b)
(6) 40 CFR 63.8820(a)
(7) 40 CFR 63.8822
(8) 40 CFR 63.8826
(9) 40 CFR 63.8828
(10) 40 CFR 63.8830
(11) Table 1 and 7

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to natural gas flame laminator machine (FL-02) except when otherwise specified in 40 CFR 63, Subpart MMMMM.

This is an existing applicable requirement.

Since the natural gas flame laminator machine (FL-02) is not equipped with add-on control to comply with this NESHAP, no performance test is required for this emission unit under this NESHAP.

(f) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
(2) is subject to an emission limitation or standard for that pollutant; and
(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
Since the existing emissions unit do not have control, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the existing units as part of this Part 70 permit renewal.

**State Rule Applicability - Entire Source**

### 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

### 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

This source is an existing PSD major source.

This is an existing requirement, first determined in SSM 003-29260-00225, issued on November 8, 2010.

The following existing requirement, determined in SSM 003-29260-00225, issued on November 8, 2010, is being carried over in this renewal.

(a) The input of VOC to polyurethane foam production line (PL-01c) shall not exceed 80.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The Permittee shall utilize the following best management practices to minimize VOC emissions from polyurethane foam production line (PL-01c):

(1) Use of the lowest VOC-content foam production materials where technically feasible;

(2) Track the quantity of amine catalyst used on a monthly basis;

(3) Store and handle the amine catalyst to minimize fugitive losses; and

(4) Continue to explore options for the production of foam using non-VOC content materials.

### 326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC is greater than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

### 326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

### 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1):

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Allen County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability - Individual Facilities

State rule applicability for this source has been reviewed as follows:

Foam Production

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of Periphlex pour line (PL-01a), Polyurethane foam production line (PL-01c), the natural gas fired boilers (IPB-01 and IPB-02), and three (3) foam bun storage areas (Carpet Underlay Mezzanine Bun Grabber Area, South Finishing Mezzanine Bun Grabber Area, and the Loaf Stacker Area) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

The operation of the natural gas flame laminator machine (FL-02) constructed in 1995 will emit equal to or greater than ten (10) tons per year for a single HAP AND/OR equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the natural gas flame laminator machine (FL-02). However, pursuant to 326 IAC 2-4.1-1(b)(2), because the natural gas flame laminator machine (FL-02) is exempt from regulation under NESHAP 40 CFR 63, Subpart MMMMM, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, the natural gas flame laminator machine (FL-02) is exempt from the requirements of 326 IAC 2-4.1.

The operation of the thermal reticulation unit (TRU-02), constructed in 2007 will emit equal to or greater than ten (10) tons per year for a single HAP AND/OR equal to or greater than twenty-five (25) tons per year for a combination of HAPs and the thermal reticulation unit (TRU-02) is not specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. Therefore, 326 IAC 2-4.1 applies. MACT is determined to be are the same as the 326 IAC 8-1-6 BACT requirements specified for
Thermal reticulation unit (TRU-02) under 326 IAC 8-1-6 rule applicability in ‘State Rule Applicability – Individual Facilities’ section of this TSD. A detailed MACT analysis is included in Title V Renewal No. T003-33748-00225 issued on August 20, 2014.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The polyurethane foam production line (PL-01c) is subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, and the polyurethane foam production line (PL-01c) is not regulated by other rules in 326 IAC 8. Therefore, a Best Available Control Technology (BACT) analysis was required for the polyurethane foam production line (PL-01c). This determination was made under source modification No. 003-29260-00225, issued on November 8, 2010.

According to the BACT analysis contained in source modification No. 003-29260-00225, issued on November 8, 2010, IDEM, OAQ has determined that the following requirements represent BACT for the polyurethane foam production line (PL-01c):

(a) The input of VOC to the one (1) polyurethane foam production line shall not exceed 80.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The Permittee shall utilize the following best management practices to minimize VOC emissions from the one (1) polyurethane foam production line:

   (1) Use of the lowest VOC-content foam production materials where technically feasible;
   (2) Track the quantity of amine catalyst used on a monthly basis;
   (3) Store and handle the amine catalyst to minimize fugitive losses; and
   (4) Continue to explore options for the production of foam using non-VOC content materials.

Compliance with the VOC usage limitations 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Natural Gas Flame Laminator

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Natural Gas Flame Laminator, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Natural Gas Flame Laminator shall not exceed 4.1 pounds per hour when operating at a process weight rate of 1 ton per hour. The pound per hour limitation was calculated with the following 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

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Equation Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>FL-02</td>
<td>1.0</td>
<td>4.1</td>
<td>( E = 4.10 P^{0.67} )</td>
</tr>
</tbody>
</table>
Based on calculations, the Natural Gas Flame Laminator Machine is able to comply without the use of a control.

**326 IAC 7-1.1 Sulfur Dioxide Emission Limitations**
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
The natural gas flame laminator machine (FL-02) is subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, and the natural gas flame laminator machine (FL-02) is not regulated by other rules in 326 IAC 8. Therefore, a Best Available Control Technology (BACT) analysis was required for the natural gas flame laminator machine (FL-02). This determination was made under source modification No. 003-5815-00225, issued on August 15, 1996.

According to the BACT analysis contained in source modification No. 003-5815-00225, issued on August 15, 1996, IDEM, OAQ has determined that the following requirements represent BACT for the natural gas flame laminator machine (FL-02):

(i) The laminated foam production rate for FL-02 shall not exceed 166,000,000 square feet per 12 consecutive month period with compliance determined at the end of each month.

(ii) The VOC emission rate from FL-02 shall not exceed 0.0003 pounds of VOC per square foot of laminated foam produced.

\[
\text{VOC emissions (tons/yr)} = 166,000,000 \text{ ft}^2/\text{year} \times 0.0003 \text{ lbs/ft}^2 \\
= 49800 \text{ lbs/yr} \\
= 24.9 \text{ tons/yr}
\]

Compliance with these limits shall limit the VOC PTE of the natural gas flame laminator machine (FL-02) to less than 25 tons per year, and therefore render the requirements of 326 IAC 8-1-6 not applicable to natural gas flame laminator machine (FL-02).

**326 IAC 9-1 (Carbon Monoxide Emission Limits)**
The requirements of 326 IAC 9-1 do not apply to the natural gas flame laminator, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

**326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)**
The requirements of 326 IAC 10-3 do not apply to the natural gas flame laminator, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

**Thermal Reticulation Unit (TRU-01)**

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
The Thermal Reticulation Unit (TRU-01) is not subject to the requirements of 326 IAC 8-1-6 because it was constructed before January 1, 1980.

**326 IAC 9-1 (Carbon Monoxide Emission Limits)**
The requirements of 326 IAC 9-1 do not apply to the Thermal Reticulation Unit (TRU-01), because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

**Thermal Reticulation Unit (TRU-02)**
The Thermal Reticulation Unit (TRU-02) is subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year, and the Thermal Reticulation Unit (TRU-02) is not regulated by other rules in 326 IAC 8. Therefore, a Best Available Control Technology (BACT) analysis was required for the Thermal Reticulation Unit (TRU-02). This determination was made under source modification No. 003-25183-00225, issued on December 18, 2007.

According to the BACT analysis contained in source modification No. 003-25183-00225, issued on December 18, 2007, IDEM, OAQ has determined that the following requirements represent BACT for the Thermal Reticulation Unit (TRU-02):

1. Maintain the thermal reticulation unit in good working order.

2. Utilize quality procedures to minimize VOC emissions from this unit. The work practices to be performed on the thermal reticulation unit include the following inspection and preventive maintenance procedures:

   a. The following preventive maintenance procedures shall be performed on the thermal reticulation unit door:
      1. Grease chamber door gear boxes.
      2. Grease nonpolymer door linkages. (May possibly be converted to polymer bushing.)
      3. Lubricate shuttle table drive chains and idler bearings.
      4. Inspect/maintain oil level in hydraulic reservoir.

   b. The following preventive maintenance procedures shall be performed on the thermal reticulation unit:
      1. On an annual basis, remove and replace roof hydrogen and oxygen valves.
      2. Per quality standard, replace floor level hydrogen and oxygen valves.

   c. The following inspections shall be done on the thermal reticulation unit:
      1. Check vacuum time and adjust if necessary.
      2. Fuel pressure check/TPM fuel fill calibration.

   d. The thermal reticulation unit Nash pump shall be lubricated.
      1. Grease lube points per quality standard.

   e. The following preventive maintenance procedures shall be performed on the thermal reticulation unit mechanical vacuum system on a daily basis:
      1. Drain the condensed water from the exhaust line into the bucket.
      2. Check the oil level through the side sight glass.
      3. Check for oil flow (sight glass with white ball).
      4. Empty condensate bucket as needed.
      5. Check mechanical blower oil level and add as needed.
      6. Check the oil purifier as follows: Check gauge for proper pressure between (20-25 psi). When the purifier pressure exceeds 40 psi, service the unit.

   f. The following preventive maintenance procedures shall be performed on the Stokes pumps per preventive maintenance frequency:
(1) Drain oil, remove side cover.
(2) Remove baffle, remove valves.
(3) Wipe inside of chamber to remove residue.
(4) Install new or rebuilt valves.
(5) Clean baffle and reinstall.
(6) Install side cover with new gasket, if needed.
(7) Refill with oil.
(8) Check V-belts for wear and proper tension, replace if needed.
(9) Check gas ballast valves, replace if needed.
(10) Perform preventive maintenance on unit oil purifier per preventative maintenance specification.

(g) The following preventive maintenance procedures shall be performed on the mechanical blower per preventive maintenance specification:

(1) Change air filter.
(2) Check for water leaks.
(3) Check V-belts.

(h) The following preventive maintenance procedures shall be performed on the chamber pressure transducer per preventive maintenance specification:

(1) Remove manometer valve.
(2) Install new or rebuilt valve.
(3) Rebuild, tag and stock valve.
(4) Check calibration of chamber pressure transducer per preventive maintenance specification.

(i) The following preventive maintenance procedures shall be performed on the shot pins per preventive maintenance frequency:

(1) Check shot pin hydraulic cylinder mount for broken or loose bolts.
(2) Check shot pin hydraulic cylinder assembly plates for torque to chamber.
(3) Check shot pin limit switch mounting bolts for tightness.

(j) The following preventive maintenance procedures shall be performed on the Nash water heat exchanger per preventive maintenance specification:

(1) Open, clean and flush all tubes.

(k) Perform fuel fill alarm preventive maintenance monthly.

(l) Perform flammable fuel detector preventive maintenance per preventive maintenance specification

(m) Perform preventive maintenance procedure on plug purge system per preventive maintenance specification:

(1) Replace the plug purge valve.
(2) Rebuild, tag and stock valve.
(3) Replace flame arrestor.
(4) Replace plug block.
(5) Clean and stock plug block.

(n) Perform thermal reticulation unit cleaning procedure dictated by production schedule:

(1) Perform clean type per schedule.
(2) Complete checklist per clean type.

(o) Perform preventive maintenance procedures on the thermal reticulation unit hydraulic system per quality control specifications:

(1) Perform oil analysis to determine replacement timing
(2) Maintain fluid level.
(3) Maintain filter.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the Thermal Reticulation Unit (TRU-02), because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

Boilers

326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(c), for indirect heating facilities existing and in operation, or received permit to construct, prior to September 21, 1983 and not located in Lake, Porter, Marion, Boone, Hamilton, Hendricks, Johnson, Morgan, Shelby, or Hancock Counties are subject to the requirements of 326 IAC 6-2-3.

The particulate matter emissions ($Pt$) shall be limited by the following equation:

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

Where:

$Pt = \text{Pounds of particulate matter emitted per million British thermal units (lb/MMBtu)}$.  

$Q = \text{Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation permit shall be used.}$  

$C = \text{Maximum ground level concentration with respect to distance from the point source at the “critical” wind speed for level terrain. This shall equal fifty (50) micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.}$  

$a = \text{Plume rise factor which is used to make allowance for less than theoretical plume rise. The value sixty-seven tenths (0.67) shall be used for } Q \text{ less than or equal to one thousand (1,000) million British thermal units per hour heat input.}$  

$N = \text{Number of stacks in fuel burning operation.}$  

$h = \text{Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:}$

$$h = \frac{\sum_{i=1}^{N} H_i \times p_a_i \times Q}{\sum_{i=1}^{N} p_a_i \times Q}$$
Where:

\[ H_i = \text{height of facility } i \text{ stack, ft.} \]
\[ p_a = \text{actual controlled emission rate of facility } i, \text{ (lb/MMBtu), using an emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.} \]
\[ Q = \text{Heat input capacity of facility } i, \text{ MMBtu/hr} \]

Pursuant to 326 IAC 6-2-3(d), units which were existing and in operation on or before June 8, 1972, Pt shall not exceed 0.8 lb/MMBtu.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler 1</td>
<td>1968</td>
<td>14.6</td>
<td>29.2</td>
<td>12.79</td>
<td>12.79</td>
<td>0.002 (Natural Gas), 0.014 (#2 oil)</td>
</tr>
<tr>
<td>Boiler 2</td>
<td>1968</td>
<td>14.6</td>
<td>29.2</td>
<td>12.79</td>
<td>12.79</td>
<td>0.002 (Natural Gas), 0.014 (#2 oil)</td>
</tr>
</tbody>
</table>

The calculated values for Pt are based on state the document used as the source of this emission information.

Where: \[ Q = \text{The total source capacity rating (MMBtu/hr) of all units existing at the source on June 8, 1972.} \]

Note: Emissions units shown in strikethrough were subsequently removed from the source.

Based on Natural Gas fuel and #2 fuel oil used by the natural gas boilers, they meet the limit under 326 IAC 6-2-4(a), since they emit 0.002 lb/MMBtu or 0.014 lb/MMBtu/hr, which is less than the calculated allowable particulate matter under the rule.

326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(1), the boilers are not subject to the requirements of 326 IAC 6-3, since they are sources of indirect heating by combustion.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
Each boiler is subject to 326 IAC 326 IAC 7-1.1 because each has a potential to emit sulfur dioxide (SO2) equal to or greater than 25 tons per year or 10 pounds per hour. Pursuant to 326 IAC 7-1.1-2(a)(3), SO2 emissions from each of these boilers shall not exceed five tenths (0.5) pounds per MMBtu heat input when burning No. 2 distillate fuel oil.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The boilers are not subject to the requirements of 326 IAC 8-1-6 because they were constructed before January 1, 1980.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the boilers, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.
326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the boilers, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Felt press

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the felt presses (FPA, FPC, FPD, FPE, FPF, and FPG) are not subject to the requirements of 326 IAC 6-3, since the potential emissions of each are less than five hundred fifty-one thousandths (0.551) per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the felt presses (FPA, FPC, FPD, FPE, FPF, and FPG) were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Hot wire cutters

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), Hot Wire Cutter 1 and Hot Wire Cutter 2, are not subject to the requirements of 326 IAC 6-3, since the potential emissions of each are less than five hundred fifty-one thousandths (0.551) per hour.

Degreasing Units

326 IAC 8-3-2 (Cold Degreaser Control and Operating Requirements)
The cold cleaner degreasing operation is subject to this rule because it is a cold cleaning operation that was constructed after July 1, 1990.

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(2) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(3) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall comply with the following:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

(i) This source is subject to the provisions of 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), because the source is a user of solvents for use in cold cleaning degreasers and the solvent is not intended to be used to clean electronic components.

The source does not sell solvents, therefore, the requirements of 326 IAC 8-3-2(c)(1) and 326 IAC 8-3-2(d)(1) do not apply to the cold cleaner degreasing operation.

(ii) Pursuant to 326 IAC 8-3-8(b), on and after January 1, 2015, the Permittee shall not operate Degreasing operations with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(iii) Pursuant to 326 IAC 8-3-8(c), on and after January 1, 2015, the Permittee shall maintain each of the following records for each solvent purchase for the Degreasing operations:

(A) The name and address of the solvent supplier.

(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(C) The type of solvent purchased.

(D) The total volume of the solvent purchased.

(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(iv) Pursuant to 326 IAC 8-3-8(d), all the records specified in paragraph (b) above shall be retained on-site or accessible electronically from the site for the most recent three (3) year period, and reasonably accessible for an additional two (2) year period.

Insignificant activities

Each of the insignificant activities listed below at the source has a process weight rate less than 100 pounds per hour. These insignificant activities are not exempt under 326 IAC 6-3-1(b) or (c). Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from each of these facilities shall not exceed 0.551 pounds per hour.
The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(ii) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(iii) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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.

(a) The Compliance Determination Requirements applicable to this source are as follows:

(1) Compliance with the VOC usage limitations contained under the state rule applicability section for individual units 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Testing Requirements:

Summary of Testing Requirements

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Testing or Date of Initial Valid Demonstration</th>
<th>Pollutant/ Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>FL-02</td>
<td>N/A</td>
<td>no later than five (5) years from the most recent testing (April 26, 2017)</td>
<td>VOC</td>
<td>Every 5 years</td>
<td>326 IAC 8-1-6</td>
</tr>
<tr>
<td>Periphlex pour line (PL-01a) (1968)</td>
<td></td>
<td>No testing is specified in 40 CFR 63 (NESHAP), Subpart III</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polyurethane foam production line (PL-01c)</td>
<td></td>
<td>No testing is specified in 40 CFR 63 (NESHAP), Subpart III</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thermal reticulation unit (TRU-01) (1968)</td>
<td></td>
<td>No specific applicable requirement</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Compliance Monitoring Requirements applicable to this source are as follows:

(1) The two (2) boilers IPB-01 and IPB-02 do not have any PM add-on control. The uncontrolled PM emissions from the two (2) boilers IPB-01 and IPB-02 are significantly low when combusting fuel oil. Therefore, visible emission monitoring requirement has not been included in the permit through this renewal.

Compliance with the limit in 326 IAC 7-1- shall be determined using one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 13, 2018.

The operation of this stationary flexible polyurethane or rebond foam production and processing plant shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T003-40692-00225.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.
IDEM Contact

(a) If you have any questions regarding this permit, please contact Nicholas Walters, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-9513 or (800) 451-6027, and ask for Nicholas Walters or (317) 234-9513.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>CO$_{2e}$</th>
<th>Total HAPs</th>
<th>Worst Case Single HAP</th>
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<tbody>
<tr>
<td>PL-01 Bun Storage</td>
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<td></td>
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<tr>
<td>FL-02 Flame Lamination</td>
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<td>16.49 Benzene</td>
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<tr>
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<td>68.85</td>
<td>68.85</td>
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<td>4.00 DEHP</td>
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### Potential to Emit after Issuance (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process</th>
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<td>1.83</td>
<td>2.17</td>
<td>1.95</td>
<td>64.86</td>
<td>18.27</td>
<td>0.31</td>
<td>4.57</td>
<td>19.71</td>
<td>4.48E-05</td>
<td>6.85E-06 Selenium</td>
</tr>
<tr>
<td>TRU-01 Hot Wire Cutting</td>
<td></td>
<td>0.19</td>
<td>0.19</td>
<td>0.19</td>
<td>0.00</td>
<td>0.00</td>
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</tr>
<tr>
<td>FL-02 Hot Wire Cutting</td>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>PL-01 Polyurethane Foam Production Line</td>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>80.80</td>
<td>0.00</td>
<td>0.00</td>
<td>9.83</td>
<td>4.00 DEHP</td>
<td></td>
</tr>
</tbody>
</table>

* VOC PTE existing 326 IAC 2-2-3 BACT 326 IAC 8-1-6 BACT.
** Particulate emissions are based on worst case fuel (#2 Fuel Oil).

This information was supplied by the source based on EPA’s Risk Assessment document for the Metal Finishing Industry.
<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material/Process</th>
<th>Maximum Throughput (ton/yr)</th>
<th>CO</th>
<th>HC</th>
<th>Non-Methane Hydrocarbons</th>
<th>PM</th>
<th>PM2.5</th>
<th>Combined ARA</th>
</tr>
</thead>
<tbody>
<tr>
<td>PL-15 e</td>
<td>Toluene</td>
<td>10.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Acetone</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Methanol</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Propylene</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Propane</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>PL-15 e</td>
<td>Butane</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Pentane</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>PL-15 e</td>
<td>Hexane</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>PL-15 e</td>
<td>Nitrogen</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Oxygen</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Carbon Monoxide</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Carbon Dioxide</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Combustible</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Non-Combustible</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>PL-15 e</td>
<td>Combined</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Notes:
1. Emission Factors for TDI and MEH are taken from TRI air toxics analysis conducted for Permit No. 901788960229, based on March 20, 1999.
2. EFs used in an assumed blend of 2.0 TDI (50% TDI), and 0.0 TDI (10% TDI).
3. EFs used in an assumed blend of 50% TDI and 50% MEH.
4. Maximum Throughput and Emission Factor (lb/hr) is for PL-15.
5. Emission Factors based on a stack test for Milliken Towers, completed in August 2006, and in terms of pounds per year. Maximum Throughput is based off of cycles per year.
Appendix A: Emissions Calculations
Insignificant Degreaser

Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-40692-00225
Reviewer: Nicholas Walters

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months".

Based on a review of the solvents most widely supplied for the industry by Crystal Clean and Safety-Kleen, the following PTE is based on the following conservative estimates:

The solvent has a maximum density of 6.7 lb/gal.
The solvent used in the degreaser contains 100% VOC and up to 0.2% HAP (tetrachloroethylene).

Uncontrolled Potential Emissions (per each degreaser)

<table>
<thead>
<tr>
<th>Solvent Density (lb/gal)</th>
<th>VOC Percentage</th>
<th>Solvent Volume (gal/yr)</th>
<th>Conversion Factor (lb/ton)</th>
<th>VOC Tons/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.7</td>
<td>100%</td>
<td>145</td>
<td>2000</td>
<td>0.49</td>
</tr>
</tbody>
</table>

\[
0.49 \times \text{tpy VOC} \times 0.2 \times \text{HAP} = 0.001 \text{ tons HAP per year}
\]
## Appendix A: Emissions Calculations

### Polyurethane Foam Manufacturing

**Company Name:** FXI, Inc.  
**Source Location:** 8951 Commercial Road, Fort Wayne, Indiana 46809  
**Permit Number:** T003-40692-00225  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (lb/hr)</th>
<th>Emission Factor (lb/hr)</th>
<th>Potential to Emit (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anime Catalyst</td>
<td>15.75</td>
<td>0.07</td>
<td>1.10</td>
</tr>
<tr>
<td>Bun Storage</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Bun Storage</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td>15.75</td>
<td>0.07</td>
<td>1.10</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (lb/hr)</th>
<th>Emission Factor (lb/hr)</th>
<th>Potential to Emit (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurethane Foam Production Line (PL-01c)</td>
<td>0.06</td>
<td>0.01</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Note:**
1. It is assumed that 100% of the throughput is emitted as VOCs.  
2. Emission Factors for TDI and MDI are taken from an air toxic analysis conducted for Permit No. T003-7680-00225, issued on March 22, 1999.  
3. Maximum Throughput (lb/hr) is based on BACT limits.

### Methodology:

- **TDI/MDI Potential to Emit (ton/yr)**:
  \[
  \text{Potential to Emit (ton/yr)} = \frac{\text{Maximum Throughput (lb/hr)} \times \text{Emission Factor (lb/hr)}}{2000 (lb/ton)}
  \]

- **VOC Potential to Emit (ton/yr)**:
  \[
  \text{Potential to Emit (ton/yr)} = \frac{(\text{Maximum Anime Catalyst Throughput (lb/hr)} + \text{TDI Emission Factor (lb/hr)} + \text{MDI Emission Factor (lb/hr)}) \times 8760 \text{ (hr/yr)}}{2000 \text{ (lb/ton)}}
  \]

**VOC Potential to Emit**:

\[
\text{VOC Potential to Emit} = \left(\text{Material to be Burned (lb/yr)} \times \frac{\text{Material to be Burned (lb/yr)}}{2000 \text{ (lb/ton)}} \times \frac{8760 \text{ (hr/yr)}}{2000 \text{ (lb/ton)}}\right)
\]
## Appendix A: Emissions Calculations

### Flame Lamination

**Company Name:** FXI, Inc.  
**Source Location:** 3005 Commercial Road, Fort Wayne, Indiana 46809  
**Permit Number:** T003-40692-00225  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (ft²/hr)</th>
<th>Limited Throughput (ft²/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FL-02</td>
<td>40,000.00</td>
<td>166,000,000.00</td>
</tr>
</tbody>
</table>

### Potential to Emit

<table>
<thead>
<tr>
<th>Emission Factor in lb/ft²</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹</th>
<th>SO₂²</th>
<th>NOₓ²</th>
<th>VOC²</th>
<th>CO¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/ft²</td>
<td>4.6E-05</td>
<td>4.6E-05</td>
<td>4.6E-05</td>
<td>6.0E-07</td>
<td>4.0E-05</td>
<td>3.0E-04</td>
<td>1.2E-04</td>
</tr>
</tbody>
</table>

**Uncontrolled Potential to Emit in lb/hr**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ft²</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹</th>
<th>SO₂²</th>
<th>NOₓ²</th>
<th>VOC²</th>
<th>CO¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/ft²</td>
<td>1.84</td>
<td>1.84</td>
<td>1.84</td>
<td>0.02</td>
<td>1.60</td>
<td>12.00</td>
<td>4.80</td>
</tr>
</tbody>
</table>

**Uncontrolled Potential to Emit in ton/yr**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ft²</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹</th>
<th>SO₂²</th>
<th>NOₓ²</th>
<th>VOC²</th>
<th>CO¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/ft²</td>
<td>8.06</td>
<td>8.06</td>
<td>8.06</td>
<td>0.11</td>
<td>7.01</td>
<td>52.56</td>
<td>21.02</td>
</tr>
</tbody>
</table>

**Limited Potential to Emit in lb/hr**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ft²</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹</th>
<th>SO₂²</th>
<th>NOₓ²</th>
<th>VOC²</th>
<th>CO¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/ft²</td>
<td>1.84</td>
<td>1.84</td>
<td>1.84</td>
<td>0.02</td>
<td>1.60</td>
<td>5.68</td>
<td>4.80</td>
</tr>
</tbody>
</table>

**Limited Potential to Emit in ton/yr**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ft²</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵¹</th>
<th>SO₂²</th>
<th>NOₓ²</th>
<th>VOC²</th>
<th>CO¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/ft²</td>
<td>8.06</td>
<td>8.06</td>
<td>8.06</td>
<td>0.11</td>
<td>7.01</td>
<td>24.90</td>
<td>21.02</td>
</tr>
</tbody>
</table>

### Notes:

1. Emission Factors based on stack testing performed on March 1995 for Foamex- Santa Teresa, New Mexico.
2. Emission Factor and throughput based on VOC BACT limit.

### Methodology:

**Unlimited Potential to Emit in lb/hr = Emission Factor in lb/ft² * Maximum Throughput (ft²/hr)**

**Unlimited Potential to Emit in ton/yr = Unlimited Potential to Emit in lb/hr * 8760 (hr/yr) / 2000 (lb/tn)**

**Limited Potential to Emit in lb/hr = Emission Factor in lb/ft² * Limited Throughput (ft²/hr)**

**Limited Potential to Emit in ton/yr = Limited Potential to Emit in lb/hr * 8760 (hr/yr) / 2000 (lb/tn)**

4.1
Appendix A: Emissions Calculations
Thermal Reticulation

Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-40962-00225
Reviewer: Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (cycles/yr)</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>TRU-01</td>
<td></td>
</tr>
<tr>
<td></td>
<td>87,600.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>TRU-02</td>
<td>87,600.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/cycle</th>
<th>PM0.1</th>
<th>PM0.5</th>
<th>PM1.0</th>
<th>SO2</th>
<th>NOX</th>
<th>VOC†</th>
<th>CO†</th>
</tr>
</thead>
<tbody>
<tr>
<td>TRU-01 Uncontrolled Potential to Emit in lb/hr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>14.00</td>
<td>0.66</td>
</tr>
<tr>
<td>TRU-01 Uncontrolled Potential to Emit in lb/hr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>14.00</td>
<td>0.66</td>
</tr>
<tr>
<td>TRU-02 Uncontrolled Potential to Emit in ton/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>61.32</td>
<td>28.91</td>
</tr>
<tr>
<td>TRU-02 Uncontrolled Potential to Emit in ton/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>61.32</td>
<td>28.91</td>
</tr>
</tbody>
</table>

Notes:
†Emission Factors based on stack testing, completed in 2007.

Methodology:
Potential to Emit (lb/hr) = Maximum Throughput (cycles/yr) * Emission Factor in lb/cycle / 8760 (hr/yr)
Potential to Emit (ton/yr) = Potential to Emit (lb/hr) * 8760 (hr/yr) / 2000 (lb/ton)

Spray adhesive application for aluminum foil
Up to two cans of CAMIE 303 Foam & Fabric Adhesive per month are used, each can containing 0.58 lbs of VOC = 1.16 lb/month. This emissions are equal to 13.92 lb/yr or 0.007 tons/yr.
Appendix A: Emissions Calculations

Bun Cutting

Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-40692-00225
Reviewer: Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (ton/hr)</th>
<th>Emission Rate (lb/hr)</th>
<th>PM Potential to Emit (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Felter (FPB)</td>
<td>0.25</td>
<td>1.62</td>
<td>7.09</td>
</tr>
<tr>
<td>One (1) skinner</td>
<td>0.50</td>
<td>2.58</td>
<td>11.29</td>
</tr>
<tr>
<td>Large Bun Cutter</td>
<td>0.33</td>
<td>1.93</td>
<td>8.46</td>
</tr>
<tr>
<td>ST Mezzanine Bun Cutter</td>
<td>0.33</td>
<td>1.93</td>
<td>8.46</td>
</tr>
<tr>
<td>ET Mezzanine Bun Cutter</td>
<td>0.33</td>
<td>1.93</td>
<td>8.46</td>
</tr>
<tr>
<td>Small Bun Cutter</td>
<td>0.33</td>
<td>1.93</td>
<td>8.46</td>
</tr>
<tr>
<td>Zapper Bun Cutter</td>
<td>0.33</td>
<td>1.93</td>
<td>8.46</td>
</tr>
<tr>
<td>Slitter (BSV1)</td>
<td>0.11</td>
<td>0.93</td>
<td>4.09</td>
</tr>
<tr>
<td>Slitter (BSV2)</td>
<td>0.11</td>
<td>0.93</td>
<td>4.09</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2.60</strong></td>
<td><strong>15.72</strong></td>
<td><strong>68.85</strong></td>
</tr>
</tbody>
</table>

Notes:
1$^\text{PM} = \text{PM}_{10} = \text{PM}_{2.5}$
2Emission Rates based on 326 IAC 6-3-2 particulate limits.

Methodology:
Emission Rate (lb/hr) = $4.10 \times (\text{Maximum Throughput (ton/yr)}^{0.67})$
Potential to Emit (ton/yr) = Potential to Emit (lb/hr) * 8760 (hr/yr) / 2000 (lb/ton)
## Appendix A: Emissions Calculations

### Emission Summary

**Company Name:** FXI, Inc.  
**Source Location:** 3005 Commercial Road, Fort Wayne, Indiana 46809  
**Permit Number:** T003-40692-00225  
**Reviewer:** Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM Emission Rate (lb/hr)</th>
<th>VOC Emission Rate (lb/hr)</th>
<th>PM Potential to Emit (ton/yr)</th>
<th>VOC Potential to Emit (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FPA (^1)</td>
<td>0.02</td>
<td>0.07</td>
<td>0.09</td>
<td>0.32</td>
</tr>
<tr>
<td>FPF (^1)</td>
<td>0.02</td>
<td>0.07</td>
<td>0.09</td>
<td>0.31</td>
</tr>
<tr>
<td>FPC (^2)</td>
<td>0.17</td>
<td>0.03</td>
<td>0.75</td>
<td>0.11</td>
</tr>
<tr>
<td>FPD (^2)</td>
<td>0.17</td>
<td>0.03</td>
<td>0.75</td>
<td>0.11</td>
</tr>
<tr>
<td>FPE (^2)</td>
<td>0.17</td>
<td>0.03</td>
<td>0.75</td>
<td>0.11</td>
</tr>
<tr>
<td>FPG (^2)</td>
<td>0.17</td>
<td>0.03</td>
<td>0.75</td>
<td>0.11</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3.18</strong></td>
<td><strong>1.08</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:**  
\(^1\) Emission Factors based on stack testing of similar equipment at the Foamex Fort Wayne plant, June 2002.  
\(^2\) Emission Factors based on stack testing, completed 2007.

**Methodology:**  
Potential to Emit (ton/yr) = Emission Rate (lb/hr) * 8760 (hr/yr) / 2000 (lb/ton)
Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-04962-00025
Reviewer: Nicholas Walters

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Heat Input Capacity (MMBtu/hr)</th>
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<tbody>
<tr>
<td>IPB-01</td>
<td>14.6</td>
</tr>
<tr>
<td>IPB-02</td>
<td>14.6</td>
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<tr>
<td>Total</td>
<td>29.2</td>
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<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV MMBtu/hr</th>
<th>Potential Throughput</th>
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<tr>
<td></td>
<td>mmBtu</td>
<td>MMCF/yr</td>
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<td>29.2</td>
<td>1020</td>
<td>250.8</td>
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<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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<tr>
<td>PM</td>
<td>1.9</td>
<td>0.24</td>
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<tr>
<td>PM10</td>
<td>7.6</td>
<td>0.95</td>
</tr>
<tr>
<td>direct PM2.5</td>
<td>7.6</td>
<td>0.95</td>
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<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.08</td>
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<tr>
<td>NOx</td>
<td>100</td>
<td>12.54</td>
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<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.69</td>
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<tr>
<td>CO</td>
<td>84</td>
<td>10.53</td>
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</tbody>
</table>

Methodology
All emission factors are based on normal firing.

Greenhouse Gases (GHGs)

<table>
<thead>
<tr>
<th>Greenhouse Gas</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>120,000</td>
<td>15,047</td>
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<tr>
<td>CH4</td>
<td>2.3</td>
<td>0.29</td>
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<tr>
<td>N2O</td>
<td>2.2</td>
<td>0.28</td>
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</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32**
Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)

#2 Fuel Oil

| Company Name: FXI, Inc. |
| Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809 |
| Permit Number: T003-40692-00225 |
| Reviewer: Nicholas Walters |

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Heat Input Capacity (MMBtu/hr)</th>
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<tbody>
<tr>
<td>IPB-01</td>
<td>14.6</td>
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<tr>
<td>IPB-02</td>
<td>14.6</td>
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<tr>
<td>Total</td>
<td>29.2</td>
</tr>
</tbody>
</table>

Heat Input Capacity

<table>
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<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/kgal</th>
<th>Potential Emission in tons/yr</th>
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</thead>
<tbody>
<tr>
<td>PM*</td>
<td>2.0</td>
<td>1.83</td>
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<tr>
<td>PM10**</td>
<td>2.38</td>
<td>2.17</td>
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<tr>
<td>PM2.5***</td>
<td>2.13</td>
<td>1.95</td>
</tr>
<tr>
<td>SO2</td>
<td>71</td>
<td>64.86</td>
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<tr>
<td>NOx</td>
<td>20.0</td>
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<tr>
<td>VOC</td>
<td>0.34</td>
<td>0.31</td>
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<tr>
<td>CO</td>
<td>5.0</td>
<td>4.57</td>
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</table>

Methodology
1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu.

- Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1,000 gallon x 1 gal per 0.140 MM Btu
- Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
- PM emission factor = filterable PM only.
- PM10 emission factor = filterable PM (0.1) + condensable PM emission factor of 1.3 (lb/kgal)
- PM2.5 emission factor = filterable PM (0.1) + condensable PM emission factor of 1.3 (lb/kgal)

- Emission Factor in lb/kgal
- Potential Emission in tons/yr = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Greenhouse Gases (GHGs)

<table>
<thead>
<tr>
<th>Emission Factor in lb/kgal</th>
<th>CO2</th>
<th>CH4</th>
<th>N2O</th>
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</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO2e Total in tons/yr</td>
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<td></td>
</tr>
</tbody>
</table>

Methodology
- The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.
- Emission Factors are from AP-42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)
- Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Appendix A: Emission Calculations

Reciprocating Internal Combustion Engines - Natural Gas

4-Stroke Lean-Burn (4SLB) Engines

Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-40600-00025
Reviewer: Nicholas Walters

Maximum Output Horsepower Rating (hp) | 168
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr) | 7500
Maximum Hours Operated per Year (hr/yr) | 500
Potential Fuel Usage (MMBtu/yr) | 0.30
Potential Fuel Usage (MMcf/yr) | 0.82

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.71E-05</td>
<td>2.43E-05</td>
</tr>
<tr>
<td>PM10*</td>
<td>9.99E-03</td>
<td>3.15E-03</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>9.99E-03</td>
<td>3.15E-03</td>
</tr>
<tr>
<td>SO2</td>
<td>1.18E-01</td>
<td>1.29</td>
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<tr>
<td>NOx</td>
<td>4.08E+00</td>
<td>1.29</td>
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<tr>
<td>VOC</td>
<td>3.17E-01</td>
<td>0.04</td>
</tr>
<tr>
<td>CO</td>
<td>3.17E-01</td>
<td>0.10</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Emissions (tons/yr) = Potential Fuel Usage (MMBtu/yr) / 1000000 Btu/MMBtu

Greenhouse Gases (GHGs)

<table>
<thead>
<tr>
<th>Greenhouse Gas (GHG)</th>
<th>Emission Factor in lb/MMBtu</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>110</td>
<td>34.65</td>
</tr>
<tr>
<td>CH4</td>
<td>1.25</td>
<td>0.39</td>
</tr>
<tr>
<td>N2O</td>
<td>2.2</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Summed Potential Emissions in tons/yr = 35.04

CO2e Total in tons/yr = 44.70

Methodology

**The CO2 and CH4 emission factors are from Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

**The N2O emission factor is from AP 42, Table 1.4-2. The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64. Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

For CO2 and CH4: Emission (tons/yr) = Potential Fuel Usage (MMBtu/yr) / 1000000 Btu/MMBtu

For N2O: Emission (tons/yr) = [Potential Fuel Usage (MMBtu/yr) / 1000000 Btu/MMBtu] x N2O Emission Factor (2.2)

CO2e Total = CO2 Total x CO2 GWP (1) + CH4 Total x CH4 GWP (25) + N2O Total x N20 GWP (298)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
VOC = Volatile Organic Compounds
CO2e = Carbon Dioxide
N2O = Nitrous Oxides
CH4 = Methane
SO2 = Sulphur Dioxide
NOx = Nitric Oxides
CO2 = Carbon Dioxide
N2O = Nitrous Oxides
CH4 = Methane
CO2e = CO2 equivalent emissions
Appendix A: Emissions Calculations
Hot Wire Cutters

Company Name: FXI, Inc.
Source Location: 3005 Commercial Road, Fort Wayne, Indiana 46809
Permit Number: T003-40692-00225
Reviewer: Nicholas Walters

There are two hot wire cutters. The following calculations is for each hot wire cutter:

Hot Wire Cutter 1 was constructed in 1991
Hot Wire Cutter 2 was constructed in 2011

Assumptions for Calculations
- Size of each bun: 50”L x 50”W x 12”H
- Maximum throughput: 60 Buns/hr
- Buns are cut by means of electrically heated wires.
- Wire size is 0.020” Diameter
- Cuts will have dimensions of 0.020” x 0.020” x length of cut
- Maximum of 16 wires/bun will cut lengthwise (50”)
- Maximum of 2 wires/bun will cut the height (12”)
- Density of the bun is 1.85 lbs/ft³

PM=PM10=PM2.5

Calculations
Loss of Volume of Foam per Bun

\[
\text{Loss of Volume of Foam per Bun} = \frac{(0.020)^2 x (0.020) x 50 \times (16 \text{ wires})}{(0.020)^2 x (0.020) x 12 \times (2 \text{ wire})} = 0.3296
\]

Loss of Volume of Foam/hr

\[
\text{Loss of Volume of Foam/hr} = (0.3296 \text{ in}^3/\text{bun}) \times (60 \text{ buns/hr}) = 19.776
\]

Loss of Volume of Foam/yr

\[
\text{Loss of Volume of Foam/yr} = (19.776 \text{ in}^3/\text{hour}) \times (8760 \text{ hrs/yr}) = 173,237.76
\]

PM Emissions

- Lbs/bun = (0.3296 in³/bun) x 0.0010706 lbs/ in³ = 0.00035287 lbs/bun
- Lbs/hr = 19.776 in³/hour x 0.0010706 lbs/ in³ = 0.02117 lbs/hr
- Tons/yr = 173,237.76 in³/yr x 0.0010706 lbs/ in³ = 185.47 lbs/yr / [2000 lbs/ton] = 0.09273417
November 19, 2019

Mr. John Maksimchuk
FXI, Inc.
3005 Commercial Road
Fort Wayne, Indiana 46809

Re: Public Notice
FXI, Inc.
Permit Level: Title V Renewal
Permit Number: 005-40692-00225

Dear Mr. Maksimchuk:

Enclosed is a copy of your draft Title V Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Allen County Public Library, 2200 Lower Huntington Road in Fort Wayne, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Nicholas Walters, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-9513 or dial (317) 234-9513.

Sincerely,

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
November 19, 2019

To: Allen County Public Library (Waynedale Branch)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: FXI, Inc.
Permit Number: 003-40692-00225

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.
Notice of Public Comment

November 19, 2019
FXI, Inc.
003-40692-00225

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

November 19, 2019

A 30-day public comment period has been initiated for:

Permit Number: 005-40692-00225
Applicant Name: FXI, Inc.
Location: Fort Wayne, Allen County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017
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<td>Joseph Cichy Plant Manager FXI Inc 3005 Commercial Rd Fort Wayne IN 46809 (RO CAATS)</td>
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Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |