CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Cooper Tire & Rubber Company
725 West Eleventh Street
Auburn, Indiana 46706

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-033-10248-00013	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

A.1 General Information

The Permittee owns and operates an automatic coating operation and injection molding presses.

Responsible Official:	George L. Hertsel
Source Address:	725 West Eleventh Street, Auburn, Indiana 46706
Mailing Address:	(same)
SIC Code:	3061
County Location:	DeKalb County
County Status:	Attainment for all criteria pollutants
Source Status:	State Construction and Operation Permit Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

This automatic coating operation and injection molding presses consist of the following equipment:

(a) one (1) automated coating line designated Auto Line #2, consisting of two (2) booths, which apply adhesive cements and primer or cover coatings through high volume low pressure (HVLP) spray guns to a maximum of 7,200 metal inserts per hour and exhaust through Stacks 121 and 122 with dry filters as particulate matter overspray control;

(b) one (1) natural gas fired drying oven associated with Auto Line #2 exhausting through Stacks 123, 124, and 125;

(c) one (1) new autoclave with a maximum throughput of 1,956 pounds molded rubber per hour; and

(d) eleven (11) injection molding presses capable of processing a maximum of 60 pounds of rubber per hour, each, with associated finish grinding steps controlled by a dust collector.

A.3 Part 70 Applicability [326 IAC 2-7-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has submitted to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), a Part 70 (T033-6253-00013) application on July 9, 1996. The equipment changes being reviewed under this permit shall be incorporated in the submitted Part 70 application.

A.4 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit supersede all terms and conditions in CP-033-9049-00013.

Section B Construction Conditions

General Construction Conditions [326 IAC 2-1-3]

B.1 Allowable Emissions

That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

B.2 General Rule Applicability

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, Sections C and D of this permit become effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1-9(b)]

Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification of Construction Conditions

Notwithstanding Condition B.6, all requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 First Time Operation Permit [326 IAC 2-1-4]

That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

Section C Source Operation Conditions

Entire Source

General Operation Conditions [326 IAC 2-1-4]

C.1 General Operation Conditions

(a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

(b) The permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

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

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

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

C.3 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this automatic coating operation and injection molding presses is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

(b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

(c) The OAM shall reserve the right to issue a new permit.

C.4 Permit Revocation [326 IAC 2-1-9(a)]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

C.5 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

C.6 Opacity Limitations [326 IAC 5-1-2]

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

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

(b) Opacity shall not exceed 60% for more than a cumulative total of 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.7 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.

C.8 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.9 Emergency Reduction Plans [326 IAC 1-5-2]

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

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

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

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

within 180 calendar days from the issuance date of this permit.

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

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

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

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

C.10 Malfunction Condition [326 IAC 1-6-2]
Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

Compliance Monitoring Requirements

C.12 Compliance Monitoring

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

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

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

C.13 Monitoring Methods [326 IAC 3]

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

C.14 Compliance Monitoring Plan - Failure to Take Response Steps

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

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

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

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) asbestos removal or demolition start date;

(B) removal or demolition contractor; or

(3) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Record Keeping and Reporting Requirements

C.16 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

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

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

C.17 General Record Keeping Requirements

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

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as defined in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

(a)	one (1) automated coating line designated Auto Line #2, consisting of two (2) booths, which apply adhesive cements and primer or cover coatings through high volume low pressure (HVLP) spray guns to a maximum of 7,200 metal inserts per hour and exhaust through Stacks 121 and 122 with dry filters as particulate matter overspray control;
(b)	one (1) natural gas fired drying oven associated with Auto Line #2 exhausting through Stacks 123, 124, and 125;
(c)	one (1) new autoclave with a maximum throughput of 1,956 pounds molded rubber per hour; and
(d)	eleven (11) injection molding presses capable of processing a maximum of 60 pounds of rubber per hour, each, with associated finish grinding steps controlled by a dust collector.

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC)

(a) The input VOC usage to the Auto Line #2 shall not exceed 16.0 tons per twelve (12) consecutive month period. This is equivalent to VOC emissions of 16.0 tons per twelve (12) consecutive month period.

(b) During the first twelve (12) months of operation, the input VOC usage shall be limited such that total usage divided by the accumulated months of operation shall not exceed 1.33 tons per month of operation.

(c) Due to these limitations, 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) and the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.1.2 Hazardous Air Pollutants (HAP)

(a) The input HAP usage to the Auto Line #2 of any single HAP shall not exceed 9.9 tons per twelve (12) consecutive month period. This is equivalent to single HAP emissions of 9.9 tons per twelve (12) consecutive month period.

(b) The input HAP usage to the Auto Line #2 of combined HAPs shall not exceed 24.0 tons per twelve (12) consecutive month period. This is equivalent to combined HAP emissions of 24.0 tons per twelve (12) consecutive month period.

(c) During the first twelve (12) months of operation, the input HAP usage of any single HAP shall be limited such that total usage divided by the accumulated months of operation shall not exceed 0.825 tons per month of operation; and during the first twelve (12) months of operation, the input HAP usage of combined HAPs shall be limited such that total usage divided by the accumulated months of operation shall not exceed 2.0 tons per month of operation.

(d) Due to these limitations, 326 IAC 2-1-3.4 (New Source Toxics Control), will not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The dry filters for particulate matter overspray control shall be in operation at all times when the Auto Line #2 booths are in operation.

(b) The Auto Line #2 spray booths shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

or

$E = 55.0P^{0.11} - 40$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is greater than 60,000 lbs/hr (30 tons/hr).

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations):

(a) The dust collector for particulate matter control from the finish grinding operations of the injection molding process shall be in operation at all times when the grinding facilities are in operation.

(b) The particulate matter emissions from the dust collector shall not exceed 0.551 pounds per hour when the grinding operations for the presses are in operation.

Compliance Determination Requirements

D.1.5 Testing Requirements

Testing of these facilities are not specifically required by this permit. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken at least monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1 and the HAP emission limits established in Condition D.1.2.

(1) The amount and VOC and HAP contents of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC and HAP contents of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usages for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.8 Reporting Requirements

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

(b) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?_____, 100 LBS/HR VOC ?_____, 100 LBS/HR SULFUR DIOXIDE ?_____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?_____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____

LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____
_____
_____

MALFUNCTION REPORTED BY:
_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____DATE:_____TIME:_____

REV 3/96 FAX NUMBER - 317 233-5967 *SEE REVERSE

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO2, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

_____

PAGE 2 OF 2

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

Permit Quarterly Report

Source Name: Cooper Tire & Rubber Co.
Source Address: 725 West Eleventh Street, Auburn, Indiana 46706
Permit No.: 033-10248-00013
Facility: Auto Line #2
Parameter: VOC
Limit: Not to exceed 16.0 tons per twelve (12) consecutive month period.

Year: _____

Month	VOC Usage this month (tons/month)	VOC Usage last 12-months (tons/12-months)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

9 Attached are supporting spreadsheets.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management - Office of Air Management - Compliance Data Section
Quarterly Report of Twelve (12) Consecutive Month Period

Company Name: Cooper Tire & Rubber Co.
Location: 725 West Eleventh Street, Auburn, Indiana 46706
Permit No.: 033-10248-00013
Source/Facility: Auto Line #2
Pollutant: hazardous air pollutants (HAPs)

Month:__________ Year: ____________

Month	Single HAP usage this month (tons/mo.)	Total single HAP usage last 12 months (tons/12 mos.) *LIMIT: 9 TONS/12 MOS. (EACH HAP)*	Combined HAPs usage this month (tons/mo.)	Total combined HAPs usage last 12 months (tons/12 mos.) *LIMIT: 24 TONS/12 MOS.*
	HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________	HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________		
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	HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________	HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________ HAP:__________ usage:__________		

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

Submitted by: ____________________
Title/Position: ____________________
Signature: ____________________
Date: ____________________

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Cooper Tire & Rubber Company
Source Location:	725 West Eleventh Street, Auburn, IN 46706
County:	DeKalb
Construction Permit No.:	CP-033-10248-00013
SIC Code:	3069
Permit Reviewer:	Janusz Johnson

The Office of Air Management (OAM) has reviewed an application from Cooper Tire & Rubber Company relating to the construction and operation of the following equipment:

(a) seven (7) new injection molding presses capable of processing a maximum of 60 pounds of rubber per hour, each, with associated finish grinding steps controlled by a dust collector; and

(b) one (1) new autoclave with a maximum throughput of 1,956 pounds molded rubber per hour.

In addition to these new emission units, Cooper Tire & Rubber Company was issued a permit (CP-033-9049) to construct and operate similar units on June 8, 1998. Because this new project and the previously approved one are at the same source and will commence operation within a span of time less than one year, EPA requires that the two projects be considered as one for the purpose of Prevention of Significant Deterioration (PSD) review. Therefore, the previously permitted emission units shall be incorporated into this review, and shall have all relevant operating conditions from the previous permit added to the new permit which will result from this review. Specifically, these previously permitted units are as follows:

(c) one (1) automated coating line designated Auto Line #2, consisting of two (2) booths, which apply adhesive cements and primer or cover coatings through high volume low pressure (HVLP) spray guns to a maximum of 7,200 metal inserts per hour and exhaust through Stacks 121 and 122 with dry filters as particulate matter overspray control.

(d) one (1) natural gas fired drying oven associated with Auto Line #2 exhausting through Stacks 123, 124, and 125.

(e) four (4) injection molding presses capable of processing a maximum of 60 pounds of rubber per hour, each, with associated finish grinding steps controlled by a dust collector.

Prior Permit Conditions Superseded

The terms and conditions of this permit supersede all terms and conditions in CP-033-9049-00013.

Stack Summary

There are no new stacks associated with the new emission units being added under this review.

Recommendation

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

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

Applications for the purposes of this review were received on August 19 and October 9, 1998, with additional information received on November 13, 1998.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (2 pages).

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	239	266
Particulate Matter (PM10)	-	266
Sulfur Dioxide (SO_2)	-	0
Volatile Organic Compounds (VOC)	-	599
Carbon Monoxide (CO)	-	0.1
Nitrogen Oxides (NO_x)	-	0.2
Single Hazardous Air Pollutant (HAP)	-	292
Combination of HAPs	-	915

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See attached spreadsheets for detailed calculations.

(b) The allowable emissions based on the rules cited are less than the potential emissions, therefore, the allowable emissions are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of particulate matter (PM) and volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

(d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) DeKalb County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	16
PM10	16
SO_2	0
VOC	580
CO	0
NO_x	0

(a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

(b) These emissions were based on the AIRS Facility Quick Look Report, dated April 1, 1998.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	12.3	12.3	0.0	39.1	0.1	0.2
PSD Threshold Level	25	15	40	40	100	40

(a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

(b) The volatile organic compound (VOC) emissions are limited to 16.0 tons/yr for the Auto Line #2, therefore, 326 IAC 8-1-6 and 326 IAC 2-2 requirements do not apply. This limit is equivalent to an input VOC usage of 16.0 tons per year to the Auto Line #2 coating booths.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-033-6253-00013) application on July 9, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to these facilities.

There are no National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63, applicable to these facilities.

State Rule Applicability

326 IAC 2-1-3.4 (New Source Toxics Control)

The Auto Line #2, which is considered a “process or production unit” as defined in 40 CFR 63.41 (incorporated by reference in 326 IAC 2-1-3.4), is not subject to 326 IAC 2-1-3.4 (New Source Toxics Control) because Cooper Tire & Rubber Co. has requested to limit the potential to emit (PTE) of combined hazardous air pollutants (HAPs) to less than 25 tons per year and to limit the potential to emit (PTE) of a single HAP to less than 10 tons per year (see Appendix A of the TSD for detailed calculations). The consideration of the Auto Line #2 being a “process or production unit” is based on the line’s capability of independently producing an intermediate product, coated metal inserts.

326 IAC 2-6 (Emission Reporting)

These facilities are subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of these facilities must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Visible Emission Limitations)

Except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations)

No person shall operate a facility such that particulate matter is emitted in excess of the pound per hour limit calculated as follows according to part (c) of the rule:

for “P” less than 30 tons per hour: $E = 4.10 * P^{0.67}$

- or -

for “P” greater than 30 tons per hour: $E = 55.0 * P^{0.11} - 40$

where: “E” is the emission rate limit in pounds per hour, and
“P” is the process throughput in tons per hour.

Due to variability in the number of units produced, painted, the types of coatings used and the weights of the units processed, no emissions rate limit has been calculated for the spray coating operations of Auto Line #2. These facilities will be assumed to comply with the rule provided the dry filter controls are in place and functioning properly at all times that the surface coating booths are in operation.

The grinding operations which are part of the finishing steps for molded parts from the new and previously permitted (CP-033-9049) injection molding presses are subject to this rule. Because the amount ground from the molded parts is less than 100 pounds per hour, particulate matter (PM) emissions from these grinding operations shall not exceed 0.551 pounds per hour. Controlled emissions from the grinding operations are calculated to be less than this allowable emissions rate, therefore, the grinding operations can comply with the rule provided the dust collector is in operation at all times that the grinding operations are being utilized.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This rule does not apply to the Auto Line #2. Although these coating operations apply coatings to metal inserts, the source is not in one of the industrial categories listed in part (a) of the rule.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

This rule would apply to the Auto Line #2 because 326 IAC 8-2-9 and all other Article 8 rules are not applicable and potential emissions of volatile organic compounds (VOC) are greater than 25 tons per year. However, Cooper Tire & Rubber Co. has requested that the VOC emissions from the Auto Line #2 be limited to 16.0 tons per year. Therefore, this rule does not apply to the Auto Line #2.

This rule does not apply to the new and previously permitted (CP-033-9049) injection molding presses because potential VOC emissions from these facilities are less than 25 tons per year.

Air Toxic Emissions

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

(a) This proposed automatic coating operation combined with the new injection molding presses may emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows (note: only single air toxics which had emissions levels greater than 10 tons per year as limited have been specifically listed):

Air Toxic Emissions

Pollutant	Rate (lb/hr)	Limited Rate (ton/yr)	Modeled Concentration (Fg/m^3)	OSHA PEL (Fg/m^3)	% OSHA PEL
Methyl Isobutyl Ketone	41.17	10.36	192.4	4,100,000.0	0.050
TOTAL HAPs	-	25.90	-	-	-

Methodology: Rate ton/yr = (rate lb/hr)*(hr/yr of operation)

The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA).

(b) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of this automatic coating operation and injection molding presses will be subject to the conditions of the attached proposed **Construction Permit No. CP-033-10248-00013.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	Cooper Tire & Rubber Company
Source Location:	725 West Eleventh Street, Auburn, IN 46706
County:	DeKalb
Construction Permit No.:	CP-033-10248-00013
SIC Code:	3061
Permit Reviewer:	Janusz Johnson

On December 3, 1998, the Office of Air Management (OAM) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that Cooper Tire & Rubber Company had applied for a construction permit to construct and operate seven (7) new injection molding presses and an autoclave. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 5, 1998, Cooper Tire & Rubber Company submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

Comment 1: Page 4, Section A.1 of the proposed permit indicates that the SIC Code for the plant is 3069. While this is consistent with Cooper's permit applications, we have reviewed the codes recently and determined that SIC code 3061 (Molded, Extruded, & Lathe-cut Mechanical Rubber Goods) more appropriately describes the activities at the Auburn plant. Please revise the proposed permit as appropriate.

Response 1: The SIC code referenced in Section A.1 of the permit has been changed to be 3061 (Molded, Extruded, & Lathe-cut Mechanical Rubber Goods). Additionally, the revised SIC code is reflected in the company information at the beginning of this Addendum.

Comment 2: Page 15, Condition D.1.1(b) of the proposed permit indicates that during the first 12 months of operation the VOC usage on Auto Line #2 is limited to the 12 month total divided by the accumulated months of operation. This indicates that the VOC usage limit declines through the first year and reaches a minimum in month twelve. This cannot be the intent of this permit condition. Instead, this condition must be intended to limit the VOC usage during the first 12 months to the 12 month total divided by 12, times the accumulated months of operation. Please revise the proposed permit accordingly.

Response 2: The intent of the first 12 months language is to provide short term limits while a basis for the rolling total is established. The condition was meant to limit the input VOC usage to one twelfth (1/12) of the total during the first month, two twelfths (2/12) of the total during the first and second months combined, and so on. Item (b) of Condition D.1.1 shall be revised as follows to clarify the intent of the condition:

(b) During the first twelve (12) months of operation, the input VOC usage shall be limited such that total usage **divided by the accumulated months of operation** shall not exceed **1.33 tons per month of operation** ~~the limit specified in (a) divided by the accumulated months of operation~~.

Comment 3: Page 15, Condition D.1.2(b) of the proposed permit limits the usage of combined HAPs on Auto Line #2 to 24.0 tons per twelve consecutive month period. However, Condition D.1.1(a) of the proposed permit limits the VOC usage on the line to 16.0 tons per twelve consecutive month period. Since the HAPs that are likely to be emitted from the line will be VOCs, it may be appropriate to limit the HAPs usage to 16.0 tons instead of 24.0 tons per twelve consecutive month period. Please revise the proposed permit as appropriate.

Response 3: Hazardous air pollutants (HAPs) are not all considered to be volatile organic compounds (VOCs). The limitations in D.1.1 and D.1.2 are for separately regulated pollutants and are considered independent of each other. While most of the HAPs emitted from the Auto Line #2 will probably be VOCs, it is possible that not all will fall into that category. Limiting the combined HAPs to 16.0 tons per 12 month period might prove overly restrictive and is beyond the intent of the limiting condition. Therefore, the condition will not be changed.

Comment 4: Page 15, Condition D.1.2(c) of the proposed permit indicates that during the first 12 months of operation the usage of individual and combined HAPs on Auto Line #2 are limited to the 12 month totals divided by the accumulated months of operation. This indicates that the HAP usage limits decline through the first year and reach a minimum in month twelve. This cannot be the intent of this permit condition. Instead, this condition must be intended to limit the individual and combined HAP usage during the first 12 months to the 12 month total divided by 12, times the accumulated months of operation. Please revise the proposed permit accordingly.

Response 4: As discussed in the response to Comment 2, the intent of the first 12 months language is to provide short term limits while a basis for the rolling total is established. Item (c) of Condition D.1.2 shall be revised as follows to clarify the intent of the condition:

(c) During the first twelve (12) months of operation, the input HAP usage of any single HAP shall be limited such that total usage **divided by the accumulated months of operation** shall not exceed **0.825 tons per month of operation** ~~the limit specified in (a) divided by the accumulated months of operation~~; and during the first twelve (12) months of operation, the input HAP usage of combined HAPs shall be limited such that total usage **divided by the accumulated months of operation** shall not exceed **2.0 tons per month of operation** ~~the limit specified in (b) divided by the accumulated months of operation~~.

Comment 5: Page 22 of the proposed permit contains a form for a quarterly HAP report. Cooper has the following comments on this form:

1. The form indicates that the limit for each single HAP is 9 tons/12 months. According to Condition D.1.2 of the permit , the limit should be 9.9 tons/12 months.

2. The form indicates that the limit for combined HAPs usage is 24 tons/12 months. As indicated in Comment 3 above, it may be appropriate to limit combined HAP usage to 16 tons/12 months.

3. There are two boxes at the bottom of the form that are to be used to indicate whether or not a deviation has occurred during the reporting period. The descriptions next to the boxes refer to deviations during the *month*. Since the form is to be used for quarterly reporting, it may be appropriate for the description to refer to deviations during the *quarter*.

Please revise the form accordingly.

Response 5: Response to No. 1 - The HAP Quarterly Report form has been changed to reflect the limited single HAP emissions level of 9.9 tons per 12 months as indicated in Condition D.1.2 on the permit.

Response to No. 2 - As discussed in the response to Comment 3, the Combined HAP limiting condition has not been changed. Therefore, no change is required to be made to the reporting form.

Response to No. 3 - The descriptions of the two deviation check boxes have been revised to indicate deviations during the *quarter*.

Comment 6: Page 1 of the Technical Support Document (TSD) indicates that the SIC Code for the plant is 3069. As indicated in Comment 1 above, Cooper has determined that SIC code 3061 more appropriately describes the activities at the Auburn plant. Please revise the TSD as appropriate.

Response 6: The TSD provides background of the permit review determinations and the resulting proposed permit. Additionally, the TSD forms the basis of changes made when addressing comments in this Addendum to the TSD and revising the proposed permit for issuance. The TSD is not considered an enforceable document. For these reasons, the TSD will not be changed, but the revised SIC information is reflected in this Addendum and the revised permit (as discussed in the response to Comment 1).

Comment 7: Page 2 of the TSD indicates that there are no new stacks associated with the new emission units. However, the new Autoclave will have a stack. Form F of the permit application identified the stack, Stack No. 126, and provided the stack parameters. Please revise the TSD as appropriate.

Response 7: As detailed in the response to Comment 6, above, the TSD itself will not be changed, but the Stack Summary will be revised in this Addendum to the TSD as follows:

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
No. 126	Autoclave	20.5	0.5	530	350

On January 13, 1998, the IDEM, OAM, determined that the following changes needed to be made to the proposed permit:

1. Condition C.6 (Opacity Limitations) has been revised to reflect current rule language as follows:

C.6 Opacity Limitations [326 IAC 5-1-2]
Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~the visible emissions~~ **opacity** shall meet the following**, unless otherwise stated in this permit**:

(a) ~~visible emissions~~ **Opacity** shall not exceed an average of 40% ~~opacity~~ in ~~24 consecutive readings~~ **any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4**.

(b) ~~visible emissions~~ **Opacity** shall not exceed 60% ~~opacity~~ for more than a cumulative total of 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.

2. Condition D.1.6 (Monitoring) has been revised as follows:

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Appendix A: Emissions Calculations
VOC and Particulate

Company Name: Cooper Tire & Rubber Co.
Address City IN Zip: 725 West Eleventh St., Auburn, IN
CP: 033-10248
Plt ID: 033-00013
Reviewer: Janusz Johnson
Date: November 6, 1998

New Curing Operations

Seven (7) new injection molding presses with a maximum throughput of 60 lbs of cured rubber each.

combined annual throughput = 3,679,200 lbs/yr
emission factor = 0.00623 lb VOC/lb throughput

potential VOC emissions = 3,679,200 lbs/yr * 0.00623 lbs VOC/lb throughput / 2000 lb/ton
= 11.46 tons VOC/yr

potential HAP emissions: single = 1.87 tons/yr (Aniline)
combined = 1.95 tons/yr

Grinding at new presses

estimated amount ground off annually = 3,679,200 lbs throughput/yr * 1% ground off = 36,792 lbs ground/yr
emission factor = 0.00178 lb VOC/lb throughput ground

potential VOC emissions = 36,792 lbs/yr * 0.00178 lbs VOC/lb throughput ground / 2000 lb/ton
= 0.03 tons VOC/yr

potential PM emissions = 36,792 lbs/yr / 2000 lb/ton
= 18.40 tons PM/yr (uncontrolled)

controlled PM emissions (95%) = 18.40 * (1-.95) = 0.92 tons controlled PM/yr

allowable PM emissions based on 326 IAC 6-3:
36,792 lbs/yr ground * 1 yr/8760 hours = 4.2 lbs/hr

because the lb/hr throughput is less than 100 lbs/hr, a default emission rate
limit of 0.551 lb/hr will be used, therefore:

allowable PM emissions (ton/yr) = 0.551 lb/hr * 8760 hrs/yr * 1 ton/ 2000 lbs = 2.4 tons/yr

potential HAP emissions: single = 0.03 tons/yr (toluene)
combined = 0.04 tons/yr

Existing milling operations will be affected by the increased rubber production. The emissions increases associated with these changes will be:

Potential VOC emissions (tons/yr) = 1.19

potential HAP emissions: single = 0.10 tons/yr (hexane)
combined = 0.13 tons/yr

One (1) new autoclave with emissions based on a maximum throughput of 1,956 lbs per hour rubber.

potential annual throughput = 17,134,560.0 lbs/yr
emission factor = 0.000393 lb VOC/lb throughput

potential VOC emissions = 17,134,560.0 lbs/yr * 0.000393 lbs VOC/lb throughput / 2000 lb/ton
= 3.37 tons VOC/yr

potential HAP emissions: single = 5.60 tons/yr (Methylene chloride)
combined = 8.55 tons/yr

Total potential emissions in tons per year from new curing operations:

PM	**18.4 ton/yr**	
VOC	**16.1 ton/yr**	
HAP (single)	**5.7 ton/yr**	**(Methylene chloride)**
HAPs (combined)	**10.7 ton/yr**	

Existing Mixing Operations

There will be no change in these existing facilities because they are already permitted at maximum capacity and will not be modified as a part of the changes covered in this permit.

Existing Finish Coating Operations

There will be no more than a negligible change in VOC emissions from the Finish Coating operations because the coatings used are all water based coatings with negligible amounts of VOC in them.

Appendix A: Emissions Calculations
Total Emissions Summary

Company Name: Cooper Tire & Rubber Co.
Address City IN Zip: 725 West Eleventh St., Auburn, IN
CP: 033-10248
Plt ID: 033-00013
Reviewer: Janusz Johnson
Date: November 13, 1998

The following is a PSD summary for all emission units both new and previously permitted under CP-033-9049.

	Potential Emissions	(tons/yr)	Potential to Emit (PTE)	(tons/yr)	
CP-033-9049					
	PM	236.6	PM	9.9	
Auto Coating Line #2 Booths	SO2	0.0	SO2	0.0	
Auto Coating Line #2 Oven	NOx	0.2	NOx	0.2	***[VOC limit reduced from***
	VOC	576.0	**VOC**	**16.0**	***24.0 to 16.0 tons/yr]***
	CO	0.1	CO	0.1	
	HAP (single)	290.8	HAP (single)	9.9	(MIBK)
	HAPS (combined)	902.4	HAPS (combined)	24.0	
CP-033-9049					
	PM	10.5	PM	*	(combined under new curing
Curing Operations	SO2	0.0	SO2	0.0	allowables)
	NOx	0.0	NOx	0.0	
	VOC	7.0	VOC	7.0	
	CO	0.0	CO	0.0	
	HAP (single)	1.1	HAP (single)	1.1	
	HAPS (combined)	1.9	HAPS (combined)	1.9	
Applications received on					
August 19 and October 9,	PM	18.4	PM	2.4	[326 IAC 6-3 Allowable]
1998	SO2	0.0	SO2	0.0	
	NOx	0.0	NOx	0.0	
New Curing Operations	VOC	16.1	VOC	16.1	
New Autoclave	CO	0.0	CO	0.0	
	HAP (single)	5.7	HAP (single)	5.7	(Methylene chloride)
	HAPS (combined)	10.7	HAPS (combined)	10.7	
Total	**PM**	**265.5**	**PM**	**12.3**	
	SO2	**0.0**	**SO2**	**0.0**	
	NOx	**0.2**	**NOx**	**0.2**	
	VOC	**599.1**	**VOC**	**39.1**	
	CO	**0.1**	**CO**	**0.1**	
	HAP (single)	**291.8**	**HAP (single)***	**10.4**	**[* based on MIBK]**
	HAPS (combined)	**914.9**	**HAPS (combined)**	**36.6**	