Ms. Dawn Johnson
Freudenberg - NOK General Partnership
P.O. Box 245
Morristown, IN 46161

Re: 145-12973-00028
First Administrative Amendment to
Part 70 145-7643-00028

Dear Ms. Johnson:

Freudenberg - NOK General Partnership was issued a Part 70 operating permit T145-7643-00028 on May 26, 1999 for the operation of a rubber product manufacturing process. A letter requesting to construct four (4) electric post-cure ovens was received on November 20, 2000. Based on the information provided by Freudenberg - NOK General Partnership, IDEM, OAQ has determined that the potential emissions from these units are at exemption level. IDEM, OAQ also determined that there are no operating conditions applicable to these emission units. This administrative amendment serves as construction and operating approval for the following:

Four (4) electric post-cure ovens, identified as 3814, 3815, 3816 and 3817, each with a maximum capacity of processing twenty (20) pounds of rubber per hour, using no control, and exhausting to stacks 3814, 3815, 3816, and 3817, respectively.

Pursuant to 326 IAC 2-7-1(21), these emission units are insignificant activities without any applicable conditions. Therefore, there are no changes to the Part 70 operating permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Linda Quigley, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3284 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

LQ/EVP
cc: File - Shelby County
U.S. EPA, Region V
Shelby County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

Appendix A: Emission Calculations

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 487 West Main Street, Morristown, Indiana 46161
MSM: 145-12973-00028
Plt ID: 145-00028
Reviewer: Linda Quigley/EVP
Date: December 21, 2000

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity		
Pollutant	Post-cure ovens	**TOTAL**
PM	0.24	0.24
PM10	0.00	0.00
SO2	0.00	0.00
NOx	0.00	0.00
VOC	8.73	8.73
CO	0.00	0.00
total HAPs	4.11	4.11
worst case single HAP	0.97	0.97
Total emissions based on rated capacity at 8,760 hours/year.		

Controlled Potential Emissions (tons/year)

Emissions Generating Activity		
Pollutant	Post-cure ovens	**TOTAL**
PM	0.24	0.24
PM10	0.00	0.00
SO2	0.00	0.00
NOx	0.00	0.00
VOC	8.73	8.73
CO	0.00	0.00
total HAPs	4.11	4.11
worst case single HAP	0.97	0.97
Total emissions based on rated capacity at 8,760 hours/year, after control.		

Appendix A: Emission Calculations
VOC and HAP Emissions
Post Cure Ovens (3814, 3815, 3816, and 3817)

Company Name: **Freudenberg - NOK General Partnership (Scottsburg I)**
Address City IN Zip: **487 W. Main Street, Morristown, IN 46161**
MSM: **145-12973-00028**
Plant ID: **145-00028**
Reviewer: **Linda Quigley/EVP**
Date: **December 21, 2000**

Pollutant	Max. Rate (lb/yr)	E.F. (lb/lb)	Emission Rate (lb/yr)	Total emissions (ton/yr)
VOC	700,800	2.49E-02	1.745E+04	**8.725E+00**
PM	700,800	6.75E-04	4.730E+02	**2.365E-01**
HAPs				
1,1,1-Trichloroethane	700,800	1.80E-05	1.261E+01	6.31E-03
1,1 Dichloroethene	700,800	1.35E-05	9.461E+00	4.73E-03
1,3-Butadiene	700,800	1.15E-05	8.059E+00	4.03E-03
2,4-Dinitrophenol	700,800	3.98E-07	2.789E-01	1.39E-04
2-Butanone	700,800	1.46E-04	1.023E+02	5.12E-02
2-Chloroacetophenone	700,800	1.34E-08	9.391E-03	4.70E-06
2-Methylphenol	700,800	2.13E-06	1.493E+00	7.46E-04
4-Methyl-2-Pentanone	700,800	7.54E-04	5.284E+02	2.64E-01
4-Nitrophenol	700,800	2.44E-07	1.710E-01	8.55E-05
Acetaldehyde	700,800	1.71E-05	1.198E+01	5.99E-03
Acetonitrile	700,800	1.14E-05	7.989E+00	3.99E-03
Acetophenone	700,800	2.13E-04	1.493E+02	7.46E-02
Acrolein	700,800	2.03E-05	1.423E+01	7.11E-03
Acrylonitrile	700,800	2.89E-04	2.025E+02	1.01E-01
Aniline	700,800	1.26E-05	8.830E+00	4.42E-03
Benzene	700,800	4.88E-05	3.420E+01	1.71E-02
Benzidine	700,800	4.44E-07	3.112E-01	1.56E-04
Biphenyl	700,800	3.96E-06	2.775E+00	1.39E-03
bis(2-Ethylhexyl)phthalate	700,800	1.82E-05	1.275E+01	6.38E-03
Bromoform	700,800	6.85E-06	4.800E+00	2.40E-03
Bromomethane	700,800	1.39E-06	9.741E-01	4.87E-04
Carbon Disulfide	700,800	2.52E-03	1.766E+03	8.83E-01
Carbon Tetrachloride	700,800	1.15E-03	8.059E+02	4.03E-01
Carbonyl Sulfide	700,800	2.79E-04	1.955E+02	9.78E-02
Chloroethane	700,800	4.19E-05	2.936E+01	1.47E-02
Chloroform	700,800	1.60E-05	1.121E+01	5.61E-03
Chloromethane	700,800	2.18E-05	1.528E+01	7.64E-03
Cumene	700,800	7.82E-05	5.480E+01	2.74E-02
Di-n-butylphthalate	700,800	8.22E-06	5.761E+00	2.88E-03
Dibenzofuran	700,800	3.29E-06	2.306E+00	1.15E-03
Dimethylaminoazobenzene	700,800	4.03E-07	2.824E-01	1.41E-04
Dimethylphthalate	700,800	3.87E-07	2.712E-01	1.36E-04
Ethyl Acrylate	700,800	1.16E-04	8.129E+01	4.06E-02
Ethylbenzene	700,800	1.06E-04	7.428E+01	3.71E-02
Hexachlorobenzene	700,800	2.29E-07	1.605E-01	8.02E-05
Hexachloroethane	700,800	3.03E-05	2.123E+01	1.06E-02
Hexane (c)	700,800	**2.78E-03**	**1.948E+03**	**9.74E-01**
Hydorquinone	700,800	1.99E-05	1.395E+01	6.97E-03
Isooctane	700,800	1.89E-05	1.325E+01	6.62E-03
Isophorone	700,800	1.63E-05	1.142E+01	5.71E-03
m-Xylene	700,800	1.33E-06	9.321E-01	4.66E-04
m-Xylene + p-Xylene	700,800	3.55E-04	2.488E+02	1.24E-01
Methylene Chloride	700,800	9.51E-04	6.665E+02	3.33E-01
N,N-Dimethylaniline	700,800	1.26E-06	8.830E-01	4.42E-04
Naphthalene	700,800	7.59E-06	5.319E+00	2.66E-03
Nitrobenzene	700,800	4.97E-07	3.483E-01	1.74E-04
o-Toluidine	700,800	5.50E-06	3.854E+00	1.93E-03
o-Xylene	700,800	1.9E-04	1.332E+02	6.66E-02
p-Xylene	700,800	2.53E-05	1.773E+01	8.87E-03
Pentachlorophenol	700,800	3.08E-07	2.158E-01	1.08E-04
Phenol	700,800	3.13E-05	2.194E+01	1.10E-02
Propanal	700,800	8.19E-05	5.740E+01	2.87E-02
Propylene Oxide	700,800	1.72E-04	1.205E+02	6.03E-02
Styrene	700,800	1.05E-04	7.358E+01	3.68E-02
Substituted Quinonline	700,800	1.23E-04	8.620E+01	4.31E-02
t-Butyl Methyl Ether	700,800	1.97E-04	1.381E+02	6.90E-02
Tetrachloroethene	700,800	1.01E-04	7.078E+01	3.54E-02
Toluene	700,800	5.68E-04	3.981E+02	1.99E-01
Trichloroethene	700,800	5.46E-06	3.826E+00	1.91E-03
Vinyl Chloride	700,800	3.24E-07	2.271E-01	1.14E-04
			Total HAPs	**4.11E+00**

Methodology

Emission factors taken from the study completed for the Rubber Manufacturers Association (RMA), 9/96; emission factors shown represent worst-case rubber on a pollutant-by-pollutant basis.

Note: The study by the RMA, 9/96, is used for AP-42, Section 4.12, Manufacture of Rubber, 6/99, draft.

Potential emissions in tons per year = maximum production rate (175,200 lbs/yr * 4 post cure ovens) * e.f. (lb/lb)/2000

Hexane is the worst case single HAP (in bold).