

Mr. James Reff
Freudenberg-NOK General Partnership
P. O. Box 245
Morristown, Indiana 46161

Re: 145-13948-00028
Second Administrative Amendment to
Part 70 No.: T145-7643-00028

Dear Mr. Reff:

Freudenberg-NOK General Partnership, located at 487 West Main Street, Morrilltown, Indiana 46161, was issued a Part 70 permit on May 26, 1999 for an engineered rubber products manufacturing plant. A letter was received on February 23, 2001, requesting the addition of the following new facilities:

- (a) One (1) metal parts wet grinding operation, which will utilize coolant at a rate of 0.60 gallon per day;
- (b) One (1) metal parts washing, equipped with a 1.0 million British Thermal Units per hour (mmBtu/hr) natural gas-fired burner to be utilized in the application of sealant for rust protection. The process will utilize 0.35 gallon of sealant per day;
- (c) One (1) natural gas-fired washer dryer, with a heat input of 0.4 mmBtu/hr; and
- (d) One (1) natural gas-fired evaporator, with a heat input of 0.195 mmBtu/hr.

The above facilities are insignificant, pursuant to 326 IAC 2-7-1(21) (see attached calculations), and with no applicable requirements. Therefore, no changes will be made to the Part 70 Permit. This administrative amendment shall serve as a construction and operating approval for the above facilities.

All 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 Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for (Aida De Guzman) or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

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 - Michele Boner

EMISSION CALCULATIONS

Source Name: Freudenberg-NOK General Partnership
 Source Location: 487 West Main Street, Morristown, Indiana 46161
 County: Shelby
 SIC Code: 3053
 Operation Permit No.: T145-7643-00028 Issuance Date: May 26, 1999
 Administrative Amendment No.: 145-13948
 Permit Reviewer: Aida De Guzman

Freudenberg-NOK General Partnership proposes to install the following equipment to be used in the engineered rubber products manufacturing process, where parts are formed from the rubber stock and metal inserts using transfer and injection rubber molding processes:

- (a) One (1) metal parts wet grinding operation, which will utilize coolant at a rate of 0.60 gallon per day;
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Emission Calculations

- (a) Natural Gas Fired Combustion Emissions: See page 1 of 1 TSD Appendix for detailed calculations.
- (b) Wet Grinding Operation:
No particulate matter is emitted from this operation. However, with the use of coolant VOC is emitted. See below calculation table for detailed emission calculations.
- (c) Evaporator: See below calculation table for detailed emission calculations.
- (d) Metal Part Washing/Rust Proofing: See below calculation table for detailed emission calculations.

Facility/Material Type	Annual Usage Based on 4,160 hours/yr (gallons/yr)	Annual Usage Based on 8760 hours/yr (gallons/yr)	Density (lb/gallon)	Weight % VOC	% Flash Off	VOC Emissions (tons/yr)
Wet Grinding						
Cimstar 540 (c)	100	211	8.58	30	100	0.27
Evaporator						
Assume the worst case that 100% of the grinding liquid (Cimstar 540 (c)) is processed in the evaporator						0.27
Parts Washing/Rust Proofing						
Chrysoat Ultraseal	60	126.3	8.4	5.2	100	0.03
Duradine 210 L	No VOC or HAP					
TOTAL						0.60

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

washer burner @ 1 mmBtu/hr
dryer burner @ 0.4 mmBtu/hr
evaporator @ 0.195 mmBtu/hr

Company Name: Freudenberg-NOK General Partnership
Address City IN Zip: 487 W. Main St., Morristown, IN 46161
Administrative Amendment No.: 145-13948-00028
Reviewer: Aida De Guzman
Date Application Received: Feb. 23, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.6	14.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.7	0.0	0.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

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