

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)**

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

**Wingfoot Commercial Tire Systems, LLC
1950 West Edgewood Avenue
Indianapolis, Indiana 46217**

(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 2-8 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.

Operation Permit No.: F097-15259-00320	
Issued by: Original Signed by John B. Chavez	Issuance Date: April 26, 2004 Expiration Date: April 26, 2009
John B. Chavez, Administrator City of Indianapolis Office of Environmental Services	

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.5 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 2-8-3(b)]

The Permittee owns and operates a stationary tire retreader.

Authorized individual:	Jeff Biltz
Source Address:	1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Mailing Address:	1950 West Edgewood Avenue, Indianapolis, Indiana 46217
General Source Phone:	(317) 788-8383
SIC Code:	7534
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as P01A and P01B, with a combined maximum capacity to grind 150 tires per day, using a water mist/fan/trailer system, identified as C01, and exhausting to stack S01.
- (b) One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter, identified as C02, that has an efficiency of 99.9% on 0.5-micron particles, and exhausting to stack S03.
- (c) One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type dry filter, identified as C03, as particulate control, and exhausting to stack S04.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas fired boiler, identified as B01, with a maximum heat input capacity of 1.7 million Btu per hour (MM Btu/hr), exhausting to stack S02.
- (b) Other categories with emissions below insignificant thresholds:
 - (1) Tire curing operations, with potential VOC emissions less than ten (10) tons per year, and less than five (5) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.

- (2) Tire repair operations using organic materials, vulcanizing cement (maximum of 4.7 gallons per year) and liner repair sealer (maximum of 9 gallons per year), with potential VOC emissions less than ten (10) tons per year.
- (3) One (1) tread extruder applying a maximum of 25 pounds of tread rubber onto a maximum of 3.2 tires per hour, with potential VOC emissions less than ten (10) tons per year.
- (4) One (1) cushion extruder processing a maximum of 3.5 pounds of extruded rubber onto a maximum of 14.4 tires per hour, with potential VOC emissions less than ten (10) tons per year.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate

compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.13 Emergency Provisions [326 IAC 2-8-12]

(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, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
OES Telephone No.: 317-327-2234
OES Facsimile No.: 317-327-2274

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the

certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, or OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

(2) If IDEM, OAQ and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 until IDEM, OAQ and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5)

year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), 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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.8 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.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(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, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (1) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (2) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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. 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as P01A and P01B, with a combined maximum capacity to grind 150 tires per day, using a water mist/fan/trailer system, identified as C01, and exhausting to stack S01.
(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 2-8-4(1)]

D.1.1 Particulate Emission Limitations, Work Practices and Control Technologies [326 IAC 6-3-2][326 IAC 2-8-4]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the tire buffing operations, identified as P01A and P01B, shall be controlled by the following equation:

$$E = 4.10 P^{0.67}$$

where E = Rate of emission in pounds per hour;
 P = Process weight rate in tons per hour.

The maximum process weight rate for tire buffing operations is 0.3125 tons per hour. Therefore, the rate of emissions from tire buffing operations shall not exceed 1.9 pounds per hour of particulate matter.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirement

D.1.3 Particulate Control

In order to comply with D.1.1, at all times tire buffing is in operation, water misting and cyclone controls must be operating, and the tubes transporting tire buffing waste from the buffing station to the cyclone and to the truck shall be sealed and have sealed connections. The number of tires buffed per twenty-four consecutive hours shall not exceed one hundred eighteen (118).

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this FESOP, the Permittee shall conduct PM-10 testing for the two (2) tire buffers, identified as P01A and P01B, in order to demonstrate compliance with Condition D.1.1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the tire buffer stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the tire buffer stack exhaust, and daily number of tires buffed.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any 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.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter and baghouse, identified as C02, that has an efficiency of 99.9% on 0.5-micron particles, and exhausting to stack S03.
(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 2-8-4(1)]

D.2.1 Particulate Emission Limitations, Work Practices and Control Technologies [326 IAC 6-3-2][326 IAC 2-8-4]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the shot blasting operations, identified as P04, shall be controlled by the following equation:

$$E = 4.10 P^{0.67}$$

where E = Rate of emission in pounds per hour;
 P = Process weight rate in tons per hour.

The maximum process weight rate for shot blasting operations is 0.325 tons per hour. Therefore, the rate of emissions from shot blasting operations shall not exceed 1.93 pounds per hour of particulate matter.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the shot blasting stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shot blasting machine, at least once per shift when the shot blasting machine is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 10.0 inches of water or a range established during the latest stack test,

the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES, and shall be calibrated at least once every six (6) months.

D.2.5 Filter Inspections

Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge-type dry filters, identified as C02. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the shot blasting machine, identified as P04, while the shot blasting machine is 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered deviation from this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the shotblasting machine when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the shot blasting machine stack exhaust.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop.
- (e) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type dry filter and a baghouse, identified as C03, as particulate control, and exhausting to stack S04.
(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 2-8-4(1)]

D.3.1 Particulate Emission Limitations, Work Practices and Control Technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the powder coating booth, identified as P05, shall be controlled by the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } \begin{array}{l} E = \text{Rate of emission in pounds per hour;} \\ P = \text{Process weight rate in tons per hour.} \end{array}$$

The maximum process weight rate for the powder coating booth is 0.325 tons per hour. Therefore, the rate of emissions from the powder coating booth shall not exceed 1.93 pounds per hour of particulate matter.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.3 Visible Emissions Notations and Monitoring

- (a) Visible emission notations of the powder coating booth stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 from the powder coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.
- (f) 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 a noticeable change in overspray emission, or evidence of overspray 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 Response Plan -Preparation, Implementation,

Records, and Reports, shall be considered a deviation of this permit.

- (g) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (h) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the powder coating operations, at least once per shift when the powder coating booth is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.3.5 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the shotblasting machine when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units

and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of visible emission notations of the powder coating booth stack exhaust, and daily number of tires coated.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.3.5, the Permittee shall maintain records once per shift of the total static pressure drop.
- (d) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: One (1) natural gas fired boiler, identified as B01, with a maximum heat input capacity of 1.7 million Btu per hour (MM Btu/hr), exhausting to stack S02. (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 2-8-4(1)]

D.4.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-2]

The natural gas boiler is subject to the provisions of 326 IAC 6-2-1(d) because it is a source of indirect heat and is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The total maximum operating capacity of the boiler is 1.7 million Btu per hour (MMBtu/hr). For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, pounds of particulate matter emitted per million Btu shall not exceed 0.6 for the natural gas boiler.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Wingfoot Tire Systems, LLC
Source Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Mailing Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
FESOP No.: 097-15259-00320

**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:

Date:

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

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

and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Wingfoot Tire Systems, LLC
Source Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Mailing Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
FESOP No.: 097-15259-00320

This form consists of 2 pages

Page 1 of 2

9 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) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
☐ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Wingfoot Tire Systems, LLC
 Source Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
 Mailing Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
 FESOP No.: 097-15259-00320

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit

Source Name: Wingfoot Commercial Tire Systems, LLC
Source Location: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
County: Marion
SIC Code: 7534
Operation Permit No.: 097-15259-00320
Permit Reviewer: Angelique Olinger

On January 23, 2004, the Office of Air Quality (OAQ) and Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Wingfoot Commercial Tire Systems, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) for the operation of a tire retreader. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. At the request of the Applicant the comment period was extended for an additional thirty (30) days.

Written comments were received from the Applicant on March 22, 2004. Upon further review, OAQ and OES have decided to make the following revisions to the draft FESOP. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added, and the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes. These comments and OES responses, including changes to the permit, are as follows:

Comment 1:

Technical Support Document, Enforcement Issue: There is no equipment listed in the section Unpermitted Emission Units and Pollution Control Equipment. Wingfoot believes item (a) was included in error.

Response 1:

IDEM and OES recognize that the Enforcement Issue was listed in the Technical Support Document in error. No change has been made to the TSD because OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice.

Comment 2:

Technical Support Document, Potential to Emit: Item (a) in this section of the TSD suggests the facility's potential to emit (PTE) is equal to or greater than 100 tons per year of PM-10. According to the TSD, PM-10 is the only pollutant that potentially could make the facility subject to permitting.

The definition of “potential emissions” cited in 326 IC 1-2-55 encompasses all PM-10 “emitted from (the) facility...without the use of pollution control equipment unless such control equipment is ... integral to the normal operation of the facility.”

In the case of this facility, the source is comprised of the following, as an integral system:

- The tire buffing assembly, including a grinding head, or rasp,
- A water mist to cool the surface as it is ground,
- A close-fitting hood, connected to a fan to draw air away from the grinding head (in the case of the Indianapolis facility, the fan is a part of the cyclone), and
- Connecting ductwork leading to a trailer in which tire buffings are collected for off-site recycling.

As indicated above, the cyclone includes the fan, but otherwise does not add significant particulate or PM-10 collection efficiency. Since the fan is physically and operationally connected to the grinding head, and the fan and ductwork are tightly connected to the collection trailer, Wingfoot asserts that it is not possible to operate the grinding head without operating the fan, and that all particulate matter and PM-10 generated by the grinding process (with the very minor exception of that which might escape into the indoor workspace around the water mist) is directed into the collection trailer.

We understand that reference has been made in the draft permit to an emission factor that appears in Chapter 4.12 of AP-42, for tire grinding. This emission factor was developed for a much different process, in which newly manufactured tires are ground to remove very small amounts of rubber to meet quality specifications and to improve surface appearance. That emission factor, cited in Appendix A as “0.50 lb PM/lb buffed” (actually, in AP-42, this factor is 0.545 pound of particulate matter per pound of rubber that is ground from the surface of the tire), applies to carcass buffing, which is a much different process from retread grinding. In fact, the AP-42 emission factor for retread grinding, 9.09E-07 lb of rubber per pound process, is more reasonable to apply. If this factor is substituted, the “PM emissions before controls” becomes 2.1E-03 ton per year.

However, Wingfoot believes it is more appropriate to refer to emissions tests previously conducted on the actual truck tire retread buffing process that is used at the Indianapolis facility. Recent emissions tests conducted at a facility similar to the Indianapolis facility confirmed that an average of 15.41 pounds of rubber were removed from each tire during the buffing process (that factor is cited in the calculations in Appendix A of the TSD). Each tire weighed approximately 100 pounds before buffing. This is much more rubber than is removed in the grinding process referenced in AP-42, and the emissions test found that 99.95% of the weight of the buffings was collected in the trailer. Of that portion of the buffings that were not collected in the trailer (that is, emitted from the trailer vent), 90.9% was composed of PM-10.

Consistent with information contained in a letter of April 10, 2003, from Mark Wilkins of Wingfoot to Cheryl Carlson of the City of Indianapolis, the resultant PM-10 PTE (at a nominal maximum production rate of 15.8 tires buffed per hour, which is higher than the 150-tire-per-day capacity cited in the draft permit) is as follows:

$$(15.8 \text{ tires buffed/hour})(15.41 \text{ lbs rubber buffed/tire})(1-0.9995 \text{ collection efficiency}) (0.909 \text{ fraction PM-10})(8760 \text{ hours/year}) = (696 \text{ lbs or } 0.48 \text{ tons per year})$$

The current maximum operating rate of the facility is approximately 1,488 hours per year. The facility wishes to have the flexibility to operate for up to 3,072 hours per year (up to 12 hours per day for 256 operating days per year). It is apparent that this calculation greatly overstates the actual PTE at either of those operating conditions.

In summary, Wingfoot asserts that the PTE calculation in the TSD is not correct, because it does not recognize that the source, consisting of the buffing assembly, water mist system, fan, connecting ductwork, and collecting trailer, is in fact an integral, physically- and operationally- connected system. In addition, an inappropriate emission factor from AP-42 was cited in the TSD to estimate PM-10 emissions from the retread buffing process. As a result, the PM-10 PTE presented in the TSD is not correct. Since the true PM-10 PTE is much less than the threshold levels, Wingfoot asserts that a FESOP is not appropriate for this source.

Response 2:

IDEM and OES believe that the potential to emit is correct as calculated. It is possible to operate the buffer without the cyclone in operation. Many tire buffing processes have waste falling to the floor as well as transferred through the cyclone so that the buffers do not become clogged. While this sort of operation does cause an inconvenience to the operator and requires a lot of sweeping and maintenance, it is possible. The physical connection of the control equipment to the buffer does not constitute its being integral, because the control equipment can be physically disconnected. IDEM and OES do not find this as ample justification to consider the cyclone control integral to the buffing process.

The AP-42 Chapter 4.12 emissions factor for carcass rubber removal is appropriate for the operations conducted at Wingfoot. The emission factor used was not developed for a much different process, in which newly manufactured tires are ground to remove very small amounts of rubber to meet quality specifications and to improve surface appearance. Carcass grinding, as defined in AP-42, Chapter 4.12, "is used for gross rubber removal and for preparation of the tire carcass for retreading." The "AP-42 emission factor" for retread grinding, 9.09E-07 is not actually an AP-42 emission factor. However, if Wingfoot would like to use a site specific emissions factor, they have not provided sufficient information. Furthermore, mass balance tests can not be considered for this process because of the weight of the water from the cooling water mist which is present in the trailer buffing waste.

Comment 3:

Technical Support Document, State Rule Applicability, Entire Source: It is indicated in this section of the TSD that the facility is required to obtain a permit. Wingfoot does not believe that any of the conditions in 326 IAC 2-7-2 apply to the facility, and that the facility is therefore not required to obtain a permit.

The discussion in reference to 326 IAC 2-8-4 indicates a production limit of 100 tires per day. This limit also appears in the discussion on item 1(b) under Compliance Requirements. In the event it is determined a FESOP is appropriate, Wingfoot requests this limit be increased to the combined capacity of the two tire buffers as indicated on the first page of the TSD, or 150 tires per day.

Response 3:

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the conditions of 326 IAC 2-7-2 do apply to the facility. If the limit for the two tire buffers were increased to 150 tires per day, the source would be out of compliance with 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies). This would increase the potential to emit of PM-10 after issuance of this permit from 7.03 tons per year to 10.55 tons per year, which is equivalent to 2.4 pounds per hour. In order to remain in compliance with 326 IAC 6-3-2, the limit for the two tire buffers has been increased to 118 tires per day. This will increase the potential to emit of PM-10 after issuance of this permit from 7.03 tons per year to 8.30 tons per year, which is equivalent to 1.89 pounds per hour. Condition D.1.3 reflects this change as follows:

D.1.3 Particulate Control

In order to comply with D.1.1, at all times tire buffing is in operation, water misting and cyclone controls must be operating, and the tubes transporting tire buffing waste from the buffing station to the cyclone and to the truck shall be sealed and have sealed connections. The number of tires buffed per twenty-four consecutive hours shall not exceed ~~one hundred (100)~~ **one hundred eighteen (118)**.

Comment 4:

Technical Support Document, State Rule Applicability, Tire Buffing: The reference to the process weight rate of 0.3125 ton per hour is not clear from the calculations presented in Appendix A. Nonetheless, the calculations above clearly indicate the tire buffing operation emits much less than the resultant allowable emissions of 1.9 pounds per hour.

Response 4:

The tire process weight rate of 0.3125 was calculated based on 100 pounds per tire (the total weight of the tire being processed), and 150 tires per day, as follows:

$$100 \text{ lbs / tire} * 150 \text{ tire / day} * 1 \text{ day / 24 hrs} * 1 \text{ ton / 2000 lbs} = 0.3125 \text{ ton / hr.}$$

As discussed in Response to Comment 3, Wingfoot will be in compliance with 326 IAC 6-3-2 with the production limit of 118 tires buffed per day.

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

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP)**

Source Background and Description

Source Name: Wingfoot Commercial Tire Systems, LLC
Source Location: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
County: Marion
SIC Code: 7534
Operation Permit No.: 097-15259-00320
Permit Reviewer: Angelique Olinger

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) has reviewed a FESOP application from Wingfoot Commercial Tire Systems, LLC relating to the operation of tire retreading.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as P01A and P01B, with a combined maximum capacity to grind 150 tires per day, using a water mist/fan/trailer system, identified as C01, and exhausting to stack S01.
- (b) One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter, identified as C02, that has an efficiency of 99.9% on 0.5-micron particles, and exhausting to stack S03.
- (c) One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type dry filter and a baghouse, identified as C03, as particulate control, and exhausting to stack S04.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas fired boiler, identified as B01, with a maximum heat input

capacity of 1.7 million Btu per hour (MM Btu/hr), exhausting to stack S02.

- (b) Other categories with emissions below insignificant thresholds:
- (1) Tire curing operations, with potential VOC emissions less than ten (10) tons per year, and less than five (5) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.
 - (2) Tire repair operations using organic materials, vulcanizing cement (maximum of 4.7 gallons per year) and liner repair sealer (maximum of 9 gallons per year), with potential VOC emissions less than ten (10) tons per year.
 - (3) One (1) tread extruder applying a maximum of 25 pounds of tread rubber onto a maximum of 3.2 tires per hour, with potential VOC emissions less than ten (10) tons per year.
 - (4) One (1) cushion extruder processing a maximum of 3.5 pounds of extruded rubber onto a maximum of 14.4 tires per hour, with potential VOC emissions less than ten (10) tons per year.

Existing Approvals

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

- (a) CP 097-0320-01, issued on October 31, 1997.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively incomplete FESOP application for the purposes of this review was received on April 12, 2001. Additional information received on April 30, 2003 makes the FESOP application administratively complete.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (six pages) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100 less than 250
PM-10	greater than 100 less than 250
SO ₂	less than 25
VOC	less than 25
CO	less than 25
NO _x	less than 25
HAPs	less than 10 of single less than 25 of combination

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
tire buffers, P01A and P01B	7.03	7.03	Negligible	0.15	Negligible	Negligible	Negligible
Shot Blasting, P04	0.12	0.12	Negligible	Negligible	Negligible	Negligible	Negligible
Powder Coating, P05	0.03	0.03	Negligible	Negligible	Negligible	Negligible	Negligible
Insignificant Activities	0.11	0.11	Negligible	2.01	0.16	0.74	Negligible
Total Emissions	7.3	7.3	Negligible	2.16	0.16	0.74	Negligible

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	maintenance attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source 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	7.3
PM10	7.3
SO ₂	negligible
VOC	2.16
CO	0.16
NO _x	0.74

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Steam generating units that have a maximum design heat input capacity of less than ten (10) million Btu per hour (10 mm Btu/hr) are not subject to 40 CFR Part 60 Subpart Dc. Therefore, this source is not subject to 40 CFR Part 60 Subpart Dc.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

This source is subject to 326 IAC 1-6-3 because it is required to obtain a Permit. Any person responsible for operating any facility required to obtain a Permit shall prepare and maintain a Preventive Maintenance Plan which includes the following:

- (a) Identification of responsible individuals for inspecting, maintaining and repairing emission control devices.
- (b) Description of items and conditions that will be inspected and an inspection schedule.
- (c) Identification of replacement parts in inventory for quick replacement.

The Preventive Maintenance Plan shall be submitted upon request and subject to review and approval by OES.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1997. This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit of all regulated pollutants before controls from this source is less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County and it has the potential to emit less than ten (10) tons per year of VOCs, and less than ten (10) tons per year of NO_x.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, source wide emissions of PM-10, SO₂, VOC and NO_x shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance (see Emissions Calculations, Appendix A). The potential to emit PM-10 before limitations from the entire source is greater than 100 tons/yr.

The following limits shall apply to assure compliance with this rule:

(1) Particulate Matter-10 (PM-10)

At any time tire buffing is in operation, water misting and cyclone controls must be operating. The tubes transporting tire buffing waste from the buffing station to the cyclone and to the truck shall be sealed and have sealed connections. The number of tire buffed per twenty-four consecutive hours shall not exceed one hundred (100).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-1 (Nonattainment Area Limitations)

This rule does not apply to this source because the potential to emit after issuance of particulate is less than one hundred (100) tons per year and it is not a specifically listed source in 326 IAC 6.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit is less than 25 tons per year and 10 pounds per hour of Sulfur Dioxide.

State Rule Applicability - Tire Buffing

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the tire buffing operations, identified as P01A and P01B, shall be controlled by the following equation:

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

The maximum process weight rate for tire buffing operations is 0.3125 tons per hour. Therefore, the rate of emissions from tire buffing operations shall not exceed 1.9 pounds per hour of particulate matter. The tire buffing operations are in compliance through the use of water misting and a cyclone.

State Rule Applicability - Shot Blasting

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the shot blasting operation, identified as P04, shall be controlled by the following equation:

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

The maximum process weight rate for shot blasting operations is 0.325 tons per hour. Therefore, the rate of emissions from shot blasting operations shall not exceed 1.93 pounds per hour of particulate matter. The shot blasting operations are in compliance through the use of a cartridge-type dry filter.

State Rule Applicability - Powder Coating Booth

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the powder coating booth, identified as P05, shall be controlled by the following equation:

$$E = 4.10 P^{0.67}$$

where E = Rate of emission in pounds per hour;
P = Process weight rate in tons per hour.

The maximum process weight rate for the powder coating booth is 0.325 tons per hour. Therefore, the rate of emissions from the powder coating booth shall not exceed 1.93 pounds per hour of particulate matter. The powder coating booth is in compliance through the use of a cartridge-type dry filter and a baghouse.

326 IAC 8-2 (Surface Coating Emission Limitations)

The powder coating booth, identified as P05, is not subject to 326 IAC 8-2 (Surface Coating Emission Limitations), because its construction commenced after January 1, 1980, and it has potential emissions of less than twenty-five (25) tons per year of VOC.

State Rule Applicability - Natural Gas Boiler

326 IAC 6-2-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

(a) The natural gas boiler is subject to the provisions of 326 IAC 6-2-1(d) because it is a source of indirect heat and is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The total maximum operating capacity of the boiler is 1.7 million Btu per hour (MMBtu/hr). For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, pounds of particulate matter emitted per million Btu shall not exceed 0.6 for the natural gas boiler. The potential to emit of particulate of the boiler is one-tenth ton per year (0.1 tons/ yr) (0.023 lbs/hr), which, at 1.7 million Btu per hour, is equivalent to 0.013 lbs particulate per million Btu (lb/MMBtu). The boiler is in compliance with 326 IAC 6-2-2 because this is less than 0.6 lbs particulate per million Btu (lb/MMBtu).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The tire buffing operations have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the tire buffing operations shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) **Work Practices**
At any time tire buffing is in operation, water misting and cyclone controls must be operating. The tubes transporting tire buffing waste from the buffing station to the cyclone and to the truck shall be sealed and have sealed connections. The number of tire buffed per twenty-four consecutive hours shall not exceed one hundred (100).
2. The shot blasting operations have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the shot blasting operations shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the shot blasting machine, at least once per shift when the shot blasting machine is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 to 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (a) **Work Practices**
The cartridge-type dry filter, identified as C02, for particulate control shall be in operation and control emissions from the shot blasting operations at all times that the shot blasting operations are in operation.
- 3. The powder coating booth has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the powder coating booth shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) **Work Practices**
The cartridge-type dry filter and baghouse, identified as C03, for particulate control shall be in operation and control emissions from the powder coating booth at all times that the powder coating booth is in operation. The number of tire rims powder coated per twenty-four consecutive hours shall not exceed one hundred (100).

Conclusion

The operation of this tire retreader shall be subject to the conditions of the attached proposed FESOP No.: F097-15259-00320.

**Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10**

**Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oligier
Date: June 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.7

14.9

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.10	0.10	0.00	0.74	0.04	0.16

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Appendix A: Emissions Calculations
VOC Emissions
Tire Grinding and Curing**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oliger
Date: June 2003

Tire Grinding

	Tires Ground per day	pounds rubber buffed per tire	VOC emissions factor ¹ (lb / lb)	VOC emissions (tons/ year)
Potential	150	15.41	5.21E-04	0.22
Limited	100	15.41	5.21E-04	0.15

VOC emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground
 * lb VOC / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr

Curing Process

Tire Cured per day	tire weight (lbs)	VOC emissions factor ¹ (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	VOC emissions (tons/ year)
365	25	1.18E-03	1.00	0%	1.97

VOC emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs VOC / lb rubber
 * lb rubber / lb tire * (1-% reduction) * 365 day / yr * 1 ton / 2000 lbs

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Total VOC emissions = 2.18

Appendix A: Emissions Calculations

HAPs Emissions

Tire Grinding and Curing

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oligier
Date: June 2003

Tire Grinding

	Tires Ground per day	pounds rubber buffed per tire	HAP emissions factor (lb / lb)	HAP emissions (tons/ year)
Potential	150	15.41	0.00E+00	0.00
Limited	100	15.41	0.00E+00	0.00

HAP emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground
 * lb HAP / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr

Curing Process

Tire Cured per day	Tire weight (lbs)	HAP emissions factor (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	HAP emissions (tons/ year)
150	25	0.00E+00	1.00	0%	0.00

HAP emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs HAP / lb rubber
 * lb rubber / lb tire * % reduction * 365 day / yr * 1 ton / 2000 lbs

Total HAP emissions = 0.00

**Appendix A: Emissions Calculations
PM Emissions
Grinding, Coating, and Shot Blasting**

**Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oliger
Date: June 2003**

Tire Grinding

	Tires Ground per day	pounds rubber buffed per tire	PM emissions factor ¹ (lb PM / lb buffed)	PM emissions before controls (tons/ year)	Reduction for water mist	Reduction for Cyclone	PM emissions after controls (tons/ year)
Potential	150	15.41	0.50	210.92	50%	90%	10.55
Limited	100	15.41	0.50	140.62	50%	90%	7.03

PM emissions (tons / yr) (EPA) = tires ground / day * lbs rubber buffed / tire ground * lb PM / lb rubber buffed
 * % reduction for water mist * % reduction for cyclone * 1 ton / 2000 lbs * 365 days / yr
 (1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Powder Coating

	Tires Coated per day	lbs coating used per tire	PM emissions factor (lb / lb)	transfer efficiency of spray gun	Control Efficiency	PM emissions (tons/ year)
Potential	240	1	0.72	30%	0.00%	22.08
Limited	100	1	0.72	30%	99.70%	0.03

PM emissions (tons / yr) = tires coated / day * lbs coating / tire * lbs PM / lbs coating
 * (1-%transfer efficiency) * (1-control efficiency) * 365 days / yr * 1 ton / 2000 lbs

Shot Blasting

	Rims per day	PM emissions factor (lb / rim)	Control Efficiency	PM emissions (tons/ year)
Potential	240	2.67E-01	0.00%	11.69
Limited	240	2.67E-01	99.00%	0.12

PM emissions (tons / yr) = rims / day * lbs PM / rim * 1-control efficiency* 365 days / year * 1 ton / 2000 lbs

Total PM emissions = 222.62 (EPA)

**Appendix A: Emissions Calculations
PM and VOC Emissions from Insignificant Facilities**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oligier
Date: June 2003

Tread Extruder

- *The maximum production rate is 3.2 tires per hour.
- *The maximum of 25 pounds of tread rubber onto each tire.
- *The emission factor for particulate is 1.23×10^{-5} pounds per pound tread.¹

PTE

$$3.2 \text{ tires / hr} * 25 \text{ lbs tread / 1 rim} * 1.23 \times 10^{-5} \text{ lbs PM / lb tread} * 8760 \text{ hrs / yr} * 1 \text{ ton / 2000 lbs} =$$

0.004 tons PM per year

Tire Repair

- *The two organic materials used are Fast-Dry Chemical Vulcanizing Cement and Butyl Liner Repair Sealer.
- *The maximum amount of Fast-Dry Chemical Vulcanizing Cement used is 4.7 gallons per year.
- * The density of Fast-Dry Chemical Vulcanizing Cement is 6.255 lbs / gal.
- *The maximum amount of Butyl Liner Repair Sealer used is 9 gallons per year.
- * The density of Butyl Liner Repair Sealer is 12.6 lbs / gal.

PTE

Fast-Dry Chemical Vulcanizing Cement:

$$4.7 \text{ gal / yr} * 6.255 \text{ lbs / gal} * 1 \text{ ton / 2000 lbs} =$$

0.014 tons PM per year

Cushion Extruder

- * The maximum production rate is 14.4 tires per hour.
- * The maximum of 3.5 pounds of extruded rubber onto each tire.
- * The emissions factor for VOC is 5.15×10^{-5} pounds per pound tread.¹

PTE

$$14.4 \text{ tires / hr} * 3.5 \text{ lbs tread / 1 rim} * 5.15 \times 10^{-5} \text{ lbs VOC / 1 lb tread} * 8760 \text{ hrs / yr} * 1 \text{ ton / 2000 lbs} =$$

0.011 tons VOC per year

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

**Appendix A: Emissions Calculations
Summary**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-15259-00320
Reviewer: Angelique Oligier
Date: June 2003

Sourcewide Potential Emissions (tons / yr)

Emissions Unit	PM	PM10	SO2	NOx	VOC	CO	HAP
NG combustion	0.10	0.10	0.00	0.74	0.04	0.16	0.00
Tire Grinding	210.92	210.92	0.00	0.00	0.22	0.00	0.00
Powder Coating	22.08	22.08	0.00	0.00	0.00	0.00	0.00
Shot Blasting	11.69	11.69	0.00	0.00	0.00	0.00	0.00
Tread Extruder	0.004	0.004	0.00	0.00	0.00	0.00	0.00
Tire Repair	0.014	0.014	0.00	0.00	0.00	0.00	0.00
Cushion Extruder	0.00	0.00	0.00	0.00	0.01	0.00	0.00
Curing	0.00	0.00	0.00	0.00	1.97	0.00	0.00
Total	244.81	244.81	0.00	0.74	2.24	0.16	0.00

Sourcewide Limited Emissions (tons / yr)

Emissions Unit	PM	PM10	SO2	NOx	VOC	CO	HAP
NG combustion	0.10	0.10	0.00	0.74	0.04	0.16	0.00
Tire Grinding	7.03	7.03	0.00	0.00	0.15	0.00	0.00
Powder Coating	0.03	0.03	0.00	0.00	0.00	0.00	0.00
Shot Blasting	0.12	0.12	0.00	0.00	0.00	0.00	0.00
Tread Extruder	0.004	0.004	0.00	0.00	0.00	0.00	0.00
Tire Repair	0.014	0.014	0.00	0.00	0.00	0.00	0.00
Cushion Extruder	0.00	0.00	0.00	0.00	0.011	0.00	0.00
Curing	0.00	0.00	0.00	0.00	1.97	0.00	0.00
Total	7.30	7.30	0.00	0.74	2.16	0.16	0.00