

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

and

HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-

**Pomp's Tire Service, Inc.  
7930 New Jersey Avenue  
Hammond, Indiana 46323**

(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.

This permit is issued in accordance with 326 IAC 2 and 40 CFR 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.: <b>F089-15270-00255</b>	
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: <u>October 15, 2002</u> Expiration Date: <u>October 15, 2007</u>

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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 the Hammond Department of Environmental Management (HDEM). The information describing the source contained in conditions A.1 and A.2 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 retreading and repair shop.

Authorized Individual:	Michael Glocke, Safety Director
Source Address:	7930 New Jersey Avenue, Hammond, Indiana 46323
Mailing Address:	1123 Cedar Street, Green Bay, Wisconsin 54305
SIC Code:	7534 - Tire Retreading and Repair Shop
Source Location Status:	Lake County
County Status:	Attainment/Unclassifiable for CO, NO <sub>2</sub> and Lead, Primary Nonattainment for SO <sub>2</sub> , Moderate Nonattainment for PM <sub>10</sub> , and Severe Nonattainment for Ozone.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source under Emission Offset Rules; <u>Not</u> 1 of 28 Source Categories

### 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) One (1) Tire Buffing Machine with a maximum design capacity of 17 tires/hr used in the removal of old tread from tire casings. Rubber shavings are collected in a B & J Pollution Control System with a rated control efficiency of 97% (PM) and 99.5% (PM<sub>10</sub>).
- (b) One (1) Universal Spray Cementing Process used for holding new rubber in place prior to curing. Maximum application rate is 0.93 gallons per hour.
- (c) One (1) Air Spray Painting Process used to paint a black strip on retreaded tires. Maximum application rate is 0.4 gallons per hour.

Pomp's Tire Service, Inc. specializes in retreading tires for numerous trucking and airline (baggage carts) accounts. Retreading is the addition of new rubber to the tread area of the tire casing. The tire retreading operation consists of a series of stages, namely, initial visual inspection, a second inspection using an NDT (non-destructive tire)-II B machine, buffing out the old tread, another inspection using an NDI (non-destructive inspection) machine, cleaning the tire, applying adhesive, repairing holes or "injuries", attachment of the new tread to the casing, curing, final inspection and air spray painting.

First, the tires are put through an initial, visual inspection in which they are graded and then determined if retreadable or not. There are two (2) visual inspection stations.

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Next, the tire is moved to what is referred to as an NDT (non-destructive tire)-II B machine. This piece of equipment is used to send electrical impulses through the tire to locate holes or other "injuries" in the tire. If the tire is found to be non-retreadable due to severe condition, the tire may be issued a Returned As Received or RAR. Some reasons why the tire may be issued an RAR are the following: separation of the belt, shoulder, or sidewall, age of the tire, or too many previous repairs.

After inspection the tire is ready to be buffed. In this stage the old tread is removed from the tire casings by using a Bandag Buffer which is actually a lathe. The buffer is used to remove the old tread from the casing using a high speed rasp wheel at a maximum rate of 17 tires per hour. The buffer is equipped with a water sprayer to cool the tires and to facilitate particulate collection. The rubber shavings are collected in a B & J Pollution Control System which has a rated control efficiency of 97%(PM) and 99.5% (PM10). This unit exhausts via one (1) flexible hose out the West side of the building into a 46,000-lb capacity semitrailer equipped with a furnace-type filter.

Details of the B & J Pollution Control System are as follows:

The B & J Pollution Control System is made up of three components: (1) an electronic control unit, (2) an air handling unit ("dust collector"), and (3) appropriate duct work.

(1) Electronic Control Unit

The electronic control unit controls the entire system. Its function is to sense the amount of work being done at the buffer. It also consists of a water control assembly which applies a spray of water to the cutting rasp, thus eliminating the heat and smoke normally created. The water is applied to the rasp through nozzles mounted on the rasp hood and is connected to the water control box via small plastic tubing.

(2) Air Handling Unit

The air handling unit is a vacuum type "dust collector" which consists of three basic components: a motor, a fan, and a semitrailer equipped with a furnace-type filter. The air flow created by the motor and fan transports the rubber dust at very high speeds (approximately 6,000 fpm) at minimum of 2,000 cfm.

The purpose of the air handling unit is to provide suction to the rasp housing, separate the rubber dust from clean air, deposit rubber dust into the bottom portion of the air handling unit or the semitrailer and emit clean air through the semitrailer exhaust.

(3) Duct Work

The duct forms a tunnel from the buffer to the "dust collector" through which the rubber dust is transported from the buffer to the air handling unit for collection. This duct work is of precise specifications to create as little resistance as possible.

Maintenance for the B & J Pollution Control System consists of the following:

- (1) The wall-mounted electronic control unit may require periodic cleaning of the strainer at the water inlet.
- (2) The nozzles mounted on the buffer hood should be visually checked frequently to insure they do not become plugged with rubber dust.

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- (3) The furnace-type filter located on the semitrailer should be maintained in accordance with the manufacturer's recommendations.

After being buffed, the tire is put through an NDI (non-destructive inspection) machine in which ultrasonic sound waves are produced and sent through the tire to verify that the tire is still safe to retread and re-use. It also determines whether or not the tire is even enough to retread.

After this inspection, the tire is sent to a Skive Station where "injuries" that still exist in the tire are removed. The tire is then sent to the Bandag Tire Spinner which is located in an open ended spray booth where the Bandag Solvent is applied to each tire by wiping it on the tire with a rag. Bandag Solvent is used to clean the tires after they have been buffed. The maximum rate of Bandag Solvent applied is 0.05 gallons per hour.

While the tire is still in the booth, Bandag Universal Spray Cement is applied to the tire casing by spray. The spray cement acts as an adhesive to hold the new rubber in place prior to curing. The maximum rate of adhesive applied per hour is 0.93 gallons. This booth vents out the roof at the Northwest corner of the building.

Next, if the tire is in need of minor repairs such as a nail hole or a 2 - 5 inch cut, it is repaired using a patch and rubber cement. There are four (4) repair cement stations. The maximum amount of Bandag C.O.I. Patch Cement and Special Blue Cement brushed on the inside of tires per hour is 0.005 gallons. Periodically, at this stage a small amount of Bandag Universal Spray Cement may be brush applied to the outside of the tire. Both materials are kept in covered containers next to the stations. The tire is then sent to another Skive Station where rubber is filled into the "injuries".

Then the tire goes through what is referred to as the "builders stage" where the tire is actually rebuilt and new, uncured tread is put on the casing. There are two (2) builder stations. Approximately 23-lbs of rubber are added to retread a tire. Again at this stage a small amount of either Universal Spray Cement (adhesive) or Bandag Solvent (cleaner) may be brushed or wiped on the tire, respectively. Both materials are kept in covered containers next to the stations.

After the tire building is completed, the tires are sent through the curing stage where the retreaded tires are prepared in batches (22 tires per batch). Advanced Radial Cure (ARC) bands are clamped into the centers of the tires. A tire curing envelope which is an expandable rubber "coat" is placed around the outside of the uncured tire. This sealing of the envelope is accomplished with the use of what is referred to as an Olsen Enveloper. The envelope aids in pulling a vacuum on the tire. The tires are then sent to one of three (3) electric, curing chambers, each capable of holding twenty-two (22) tires at any given time. Pressure is then applied on the inside of the "coat" or what is referred to as tire pressure at (110 - 115 psi) and on the outside of the tire or what is referred to as chamber pressure at (85 - 86 psi) causing vulcanization to take place. Vulcanization is basically heat treating the tire in order to harden the rubber and make it more durable. The tires are cured using electric heat at (210 - 215°F) and pressure for approximately three hours and 40 minutes. After the vulcanization process is complete the tires are removed from the chamber and the ARC bands are removed from the center of the tires.

The tires are then sent to the final inspection station. Here the tires are inspected to verify the correct casing, tread design, and repairs were made.

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Finally, the tires are sent to the Air Spray Painting station where a black strip is painted on the tires using an air spray system. The maximum rate of Black Tire Paint Universal applied per hour is 0.4 gallons.

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):

- (1) Space heaters, process heaters, or boilers using the following fuels: natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.  
-Two (2) Armstrong, natural gas-fired space heaters, each rated at 150,000 Btu per hour.
- (2) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (3) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 0.7 kPa: 5 mm Hg: or 0.1 psi measured at 20°C (68°F): the use of which for all cleaners and solvents combined does not exceed 145 gallons per month.
- (4) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (5) Other activities or categories not previously identified:

One (1) Repair Cementing Process which includes four (4) stations used in repairing "injuries" in the tires. Maximum application rate is 0.005 gallons per hour. Emissions from this process are less than the following thresholds:

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

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) and the Hammond Department of Environmental Management (HDEM) to renew 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.

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## **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 meaning 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)]  
This permit is issued for a fixed term of five (5) years from the original date, 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, HDEM, 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 HDEM.
- 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 Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]  
(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

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

- (b) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM 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 HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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 HDEM 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 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 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.12 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. All 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<sup>th</sup> 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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (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 HDEM 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 HDEM 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.13 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

**B.14 Emergency Provision [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 HDEM 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

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and

HDEM:

Telephone No.: 219-853-6306

Facsimile No.: 219-853-6343

Failure to notify IDEM, OAQ and HDEM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

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 HDEM 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 HDEM 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.

B.15 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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 not 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.

- 
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 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 HDEM 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 HDEM 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 HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 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 and HDEM 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 to:

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Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

- (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 HDEM on or before the date it is due.
- (2) If IDEM, OAQ and HDEM 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 HDEM 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 HDEM any additional information identified as needed to process the application.

B.18 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, IN 46206-6015

and to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

Any such application should 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)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 HDEM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;

- 
- (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) **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).
- (d) **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.20 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.21 Inspection and Entry** [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, HDEM, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control** [326 IAC 2-8-10]

- (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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

- (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 317-233-0425 (ask for OAQ, Technical Support and Modeling 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 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 volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) 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 regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
  - (3) 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
  - (4) 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) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) 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.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 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 twenty percent (20%) 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.

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- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(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.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]  
The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).
- 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 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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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 14-10-4 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) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **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

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

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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 HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM 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. 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than **once an hour** until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

- 
- C.14 **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.
- C.15 **Pressure Gauge and Other Instrument Specifications** [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]
- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
  - (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

- C.16 **Risk Management Plan** [326 IAC 2-8-4] [40 CFR 68.215]  
If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:
- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
  - (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- C.17 **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 HDEM 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 timeframe 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.

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- (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.
  - (3) 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.
  - (4) Failure to take reasonable response steps shall constitute a violation of 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 2-7-16 (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.18 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 and HDEM 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 and HDEM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ or HDEM may extend the retesting deadline.
- (c) IDEM, OAQ and HDEM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The 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.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

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

and to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

This emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

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C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location 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 HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM with 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.21 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 Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and to:

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

- (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 HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

C.22 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)]:

Point No. 1: **Tire Buffing Machine** with a maximum design capacity of 17 tires/hr used in the removal of old tread from tire casings. Rubber shavings are collected in a B & J Pollution Control System which has a rated control efficiency of 97% (PM) and 99.5% (PM10). Exhaust from the B & J Pollution Control System vents outside the building via one (1) flexible hose and into a 46,000-lb capacity semitrailer equipped with a furnace-type filter.

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

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

- D.1.1 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)]  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Point No. 1 Tire Buffing Machine shall be limited to 2.999 lbs/hr which is equivalent to 13.139 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.
- D.1.2 Particulate Matter less than 10 microns in diameter (PM10)  
Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), particulate matter less than 10 microns in diameter (PM10) emissions from this facility shall be limited to the potential PM10 emissions after controls or 0.500 lbs/hr which is equivalent to 2.189 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the requirements of Part 70 (326 IAC 2-7) do not apply.
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

### Compliance Determination Requirements

- D.1.4 Particulate Matter less than 10 microns in diameter (PM10)  
The B & J Pollution Control System shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

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

- D.1.5 Visible Emissions Notations
- (a) Visible emission notations of the Tire Buffing Machine exhaust from the B & J Pollution Control System 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) 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 violation of this permit.

#### D.1.6 B & J Pollution Control System Inspections

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), once per day the source shall assure that the hose and filter are intact and in good working order to ensure that the exhaust from the B & J Pollution Control System that vents outside via one (1) flexible hose and into the semitrailer is totally contained prior to operation of the Tire Buffing Machine.

### **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the Tire Buffing Machine exhaust from the B & J Pollution Control System once per shift.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.
- (c) To document compliance with the emission limitations as stated in Conditions D.1.1 and D.1.2, the Permittee shall maintain a monthly record of the number of tires processed and calculate the PM and PM10 emissions on a monthly basis using the PM & PM10 Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

- (d) 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)]:

Point No. 2: **Universal Spray Cementing Process** used for holding new rubber in place prior to curing. Maximum application rate of Bandag Universal Spray Cement is 0.93 gallons per hour. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

#### D.2.1 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 2-7]

Total input of volatile organic compounds (VOC) from the Universal Spray Cementing and Air Spray Painting Processes shall be limited to less than twenty-five (25) tons per 12 consecutive month period. Therefore, the requirements of Emission Offset (326 IAC 2-3) and the Part 70 Operating Permit Program (326 IAC 2-7) do not apply.

Any change or modification which may increase potential emissions of VOC to above 25 tons per 12 consecutive month period must be approved by HDEM before any such change may occur.

#### D.2.2 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522 (as amended)]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Point No. 2 Universal Spray Cementing Process shall be limited to 0.742 lbs/hr which is equivalent to 3.251 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.

#### D.2.3 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), particulate matter less than 10 microns in diameter (PM10) emissions from this facility shall be set equal to the PM emission limit or 0.742 lbs/hr which is equivalent to 3.251 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

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

#### D.2.5 Particulate Matter Overspray

Pursuant to CP #543, issued on December 7, 1995, the dry filters for particulate matter overspray control shall be maintained in proper operating condition as per the manufacturer's recommendations and shall be in operation at all times when the Universal Spray Cementing Process is in operation. This is not a federally enforceable condition.

#### D.2.6 Dry Filter Inspections

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Universal Spray Cementing Process stack while the process 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 a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when 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 violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.2.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound (VOC) emission limit established in D.2.1.
  - (1) The total quantity of universal spray cement used (in gallons) per month.
  - (2) The total tons of VOCs emitted for each compliance period. Each compliance period shall be the consecutive twelve (12) month period that includes the most recent month and the previous eleven (11) months.
- (b) To document compliance with the emission limitations as stated in Conditions D.2.2 and D.2.3, the Permittee shall maintain a monthly record of the total quantity of universal spray paint used and calculate the PM and PM10 emissions on a monthly basis using the PM & PM10 Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.
- (c) To document compliance with Conditions D.2.5 and D.2.6, 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) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

#### **D.2.8 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

Point No. 3: **Air Spray Painting Process** used to paint a black strip on retreaded tires. Maximum application rate of Black Tire Paint Universal is 0.4 gallons per hour.  
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

#### D.3.1 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 2-7]

Total input of volatile organic compounds (VOC) from the Air Spray Painting and Universal Spray Cementing Processes shall be limited to less than twenty-five (25) tons per 12 consecutive month period. Therefore, the requirements of Emission Offset (326 IAC 2-3) and the Part 70 Operating Permit Program (326 IAC 2-7) do not apply.

Any change or modification which may increase potential emissions of VOC to above 25 tons per 12 consecutive month period must be approved by HDEM before any such change may occur.

#### D.3.2 Particulate Matter (PM) [Hammond AQC Ordinance No. 3522]

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), the PM emissions from Point No. 3 Air Spray Painting Process shall be limited to 0.516 lbs/hr which is equivalent to 2.260 tons/yr. This requirement will ensure that the source total PM emissions stay below 100 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply.

#### D.3.3 Particulate Matter less than 10 microns in diameter (PM10)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), particulate matter less than 10 microns in diameter (PM10) emissions from this facility shall be set equal to the PM emission limit or 0.516 lbs/hr which is equivalent to 2.260 tons/yr and that visible emissions from this facility shall not exceed 20% opacity. This requirement will ensure that the source total PM10 emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

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

D.3.5 Monthly records of the total quantity of paint used shall be maintained and submitted quarterly on the form attached to demonstrate compliance with the applicable emission limitations. These monitoring conditions are necessary to ensure compliance with the requirements of 326 IAC 2-8 (FESOP).

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

#### D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound (VOC) emission limit established in D.3.1.

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- (1) The total quantity of paint used (in gallons) per month.
  - (2) The total tons of VOCs emitted for each compliance period. Each compliance period shall be the consecutive twelve (12) month period that includes the most recent month and the previous eleven (11) months.
- (b) To document compliance with Conditions D.3.2 and D.3.3, the Permittee shall maintain a monthly record of the total quantity of paint used and calculate the PM and PM10 emissions on a monthly basis using the PM & PM10 Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

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

**D.3.7 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-**

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

Source Name: **Pomp's Tire Service Inc.**  
Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
FESOP No.: **F089-15270-00255**

**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

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION  
5925 CALUMET AVENUE  
HAMMOND, INDIANA 46320**

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

Source Name: **Pomp's Tire Service, Inc.**  
Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
FESOP No.: **F089-15270-00255**

**This form consists of 2 pages**

**Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (4) business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and
- The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), 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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 -AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 VOC Compliance Monitoring Form**

Source Name: **Pomp's Tire Service Inc.**  
 Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
 Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
 FESOP No.: **F089-15270-00255**

Source Limit: **VOC = 25 Tons per year, 12-month rolling average**

Reporting Month: \_\_\_\_\_ Year: \_\_\_\_\_

Parameter	Quantity	VOC Emissions (Tons)
<b>Universal Spray Cement</b>		
Total Quantity of Spray Cement Used for the Month		-----
VOC Emissions (Spray Cement usage gal x 5.202 lbs/gal ÷ 2000 lbs/ton)	-----	
<b>Air Spray Painting</b>		
Total Quantity of Paint Used for the Month		-----
VOC Emissions (Paint usage gal x 1.3 lbs/gal ÷ 2000 lbs/ton)	-----	
<b>Total Month Emissions</b>		
Add VOC emissions from the Universal Spray Cement and Air Spray Painting Processes	-----	

- No deviations occurred this month
- Deviation(s) occurred this month.  
 Deviation(s) has been reported on: \_\_\_\_\_
- Attached are supporting documentation

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 -AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 PM & PM10 Compliance Monitoring Form**

Source Name: **Pomp's Tire Service Inc.**  
 Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
 Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
 FESOP No.: **F089-15270-00255**

Source Limit: **PM & PM10 = 100 Tons per year, 12-month rolling average**

Reporting Month: \_\_\_\_\_ Year: \_\_\_\_\_

Current Month Emissions			
Parameter	Throughputs	PM emissions (Tons)	PM10 emissions (Tons)
Tire Buffing Machine (# of tires)			
Universal Spray Cement (gallons)			
Air Spray Painting (gallons)			
<b>Total for the Month</b>			
Previous 11 Months Emissions			
Month 11	N/A		
Month 10	N/A		
Month 9	N/A		
Month 8	N/A		
Month 7	N/A		
Month 6	N/A		
Month 5	N/A		
Month 4	N/A		
Month 3	N/A		
Month 2	N/A		
Month 1	N/A		
Total Previous 12 Months			
Total for the Previous 12 Months (Add Current plus 11 previous months)	N/A		

Equations: (Tire Buffing Machine)  
 PM emissions (Tons) = Throughput (m/Tires) x 5882 lbs/mTires ÷ 2000 x (1-0.97)  
 PM10 emissions (Tons) = Throughput (m/Tires) x 5882 lbs/mTires ÷ 2000 x (1-0.995)

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*(Universal Spray Cement)*

**PM emissions (Tons) = Throughput (gallons) x 0.798 lbs/gal ÷ 2000**

**PM10 emissions (Tons) = Throughput (gallons) x 0.798 lbs/gal ÷ 2000**

*(Air Spray Painting)*

**PM emissions (Tons) = Throughput (gallons) x 1.29 lbs/gal ÷ 2000**

**PM10 emissions (Tons) = Throughput (gallons) x 1.29 lbs/gal ÷ 2000**

No deviations occurred this month

Deviation(s) occurred this month.

Deviation(s) has been reported on: \_\_\_\_\_

Attached are supporting documentation

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
FESOP-Visual Emissions Notations Form**

Source Name: **Pomp's Tire Service Inc.**  
Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
FESOP No.: **F089-15270-00255**

Month: \_\_\_\_\_ Year: \_\_\_\_\_

	Tire Buffing Machine (Normal/Abnormal)		Tire Buffing Machine (Normal/Abnormal)
Day 1		Day 17	
Day 2		Day 18	
Day 3		Day 19	
Day 4		Day 20	
Day 5		Day 21	
Day 6		Day 22	
Day 7		Day 23	
Day 8		Day 24	
Day 9		Day 25	
Day 10		Day 26	
Day 11		Day 27	
Day 12		Day 28	
Day 13		Day 29	
Day 14		Day 30	
Day 15		Day 31	
Day 16			

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION**

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

Source Name: **Pomp's Tire Service, Inc.**  
Source Address: 7930 New Jersey Avenue, Hammond, Indiana 46323  
Mailing Address: 1123 Cedar Street, Green Bay, Wisconsin 54305  
FESOP No.: **F089-15270-00255**

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

**Hammond Department of Environmental Management**

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Pomp's Tire Service, Inc.  
7930 New Jersey Avenue  
Hammond, Indiana 46323**

**F089-15270, Plt ID-089-00255**

On August 20, 2002, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that Pomp's Tire Service, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a Tire Retreading and Repair Shop. The notice also stated that HDEM 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.

No comments were received during the public notice period.

On September 27, 2002, HDEM made the following corrections/changes to the proposed FESOP Renewal (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. On page 1 of 43 of the permit, the word "Renewal" was added.

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

2. On pages 2 and 3 of 43 of the permit, the applicable rules were added after Conditions B.16, C.15, C.17, and C.18 in the Table of Contents.

B.16 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]**

C.15 Pressure Gauge and Other Instrument Specifications **[326 IAC 2-1.1-11]  
[326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

C.16 Risk Management Plan **[326 IAC 2-8-4] [40 CFR 68.215]**

C.17 Compliance Response Plan – Preparation, Implementation, Records, and Reports  
**[326 IAC 2-8-4] [326 IAC 2-8-5]**

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-8-4]  
[326 IAC 2-8-5]**

3. On page 19 of 43 of the permit, Condition B.25 Annual Fee Payment was misnumbered. It should be B.23 Annual Fee Payment.

**B.253** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

4. On page 26 of 43 of the permit, HDEM was added to Condition C.18 Actions Related to Noncompliance Demonstrated by a Stack Test.

**C.18** 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, **and HDEM** 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 **and HDEM** that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ **or HDEM** may extend the retesting deadline.
- (c) IDEM, OAQ **and HDEM** reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Hammond Department of Environmental Management  
- Air Pollution Control Division-**

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

**Source Background and Description**

**Source Name:** Pump's Tire Service, Inc.  
**Source Location:** 7930 New Jersey Avenue, Hammond, Indiana 46323  
**County:** Lake  
**SIC Code:** 7534 – Tire Retreading & Repair Shop  
**Operation Permit No.:** F089-15270-00255  
**Permit Reviewer:** Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed a FESOP renewal application from Pump's Tire Service, Inc. relating to the operation of a Tire Retreading and Repair Shop. Pump's Tire Service, Inc. was issued FESOP 089-7444-00255 on September 22, 1997.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) Tire Buffing Machine with a maximum design capacity of 17 tires/hr used in the removal of old tread from tire casings. Rubber shavings are collected in a B & J Pollution Control System with a rated control efficiency of 97% (PM) and 99.5% (PM10).
- (b) One (1) Universal Spray Cementing Process used for holding new rubber in place prior to curing. Maximum application rate is 0.93 gallons per hour.
- (c) One (1) Air Spray Painting Process used to paint a black strip on retreaded tires. Maximum application rate is 0.4 gallons per hour.

Pump's Tire Service, Inc. specializes in retreading tires for numerous trucking and airline (baggage carts) accounts. Retreading is the addition of new rubber to the tread area of the tire casing. The tire retreading operation consists of a series of stages, namely, initial visual inspection, a second inspection using an NDT (non-destructive tire)-II B machine, buffing out the old tread, another inspection using an NDI (non-destructive inspection) machine, cleaning the tire, applying adhesive, repairing holes or "injuries", attachment of the new tread to the casing, curing, final inspection and air spray painting.

First, the tires are put through an initial, visual inspection in which they are graded and then determined if retreadable or not. There are two (2) visual inspection stations.

Next, the tire is moved to what is referred to as an NDT (non-destructive tire)-II B machine. This piece of equipment is used to send electrical impulses through the tire to locate holes or other "injuries" in the tire. If the tire is found to be non-retreadable due to severe condition, the tire may be issued a Returned As Received or RAR. Some reasons why the tire may be issued an RAR are the following: separation of the belt, shoulder, or sidewall, age of the tire, or too many previous repairs.

After inspection the tire is ready to be buffed. In this stage the old tread is removed from the tire casings by using a Bandag Buffer which is actually a lathe. The buffer is used to remove the old tread from the casing using a high-speed rasp wheel at a maximum rate of 17 tires per hour. The buffer is equipped with a water sprayer to cool the tires and to facilitate particulate collection. The rubber shavings are collected in a B & J Pollution Control System which has a rated control efficiency of 97%(PM) and 99.5% (PM10). This unit exhausts via one (1) flexible hose out the West side of the building into a 46,000-lb capacity semitrailer equipped with a furnace-type filter.

Details of the B & J Pollution Control System are as follows:

The B & J Pollution Control System is made up of three components: (1) an electronic control unit, (2) an air handling unit ("dust collector"), and (3) appropriate duct work.

(1) Electronic Control Unit

The electronic control unit controls the entire system. Its function is to sense the amount of work being done at the buffer. It also consists of a water control assembly which applies a spray of water to the cutting rasp, thus eliminating the heat and smoke normally created. The water is applied to the rasp through nozzles mounted on the rasp hood and is connected to the water control box via small plastic tubing.

(2) Air Handling Unit

The air handling unit is a vacuum type "dust collector" which consists of three basic components: a motor, a fan, and a semitrailer equipped with a furnace-type filter. The air flow created by the motor and fan transports the rubber dust at very high speeds (approximately 6,000 fpm) at minimum of 2,000 cfm.

The purpose of the air handling unit is to provide suction to the rasp housing, separate the rubber dust from clean air, deposit rubber dust into the bottom portion of the air handling unit or the semitrailer and emit clean air through the semitrailer exhaust.

(3) Duct Work

The duct forms a tunnel from the buffer to the "dust collector" through which the rubber dust is transported from the buffer to the air handling unit for collection. This duct work is of precise specifications to create as little resistance as possible.

Maintenance for the B & J Pollution Control System consists of the following:

- (1) The wall-mounted electronic control unit may require periodic cleaning of the strainer at the water inlet.
- (2) The nozzles mounted on the buffer hood should be visually checked frequently to insure they do not become plugged with rubber dust.
- (3) The furnace-type filter located on the semitrailer should be maintained in accordance with the manufacturer's recommendations.

After being buffed, the tire is put through an NDI (non-destructive inspection) machine in which ultrasonic sound waves are produced and sent through the tire to verify that the tire is still safe to retread and re-use. It also determines whether or not the tire is even enough to retread. After this inspection, the tire is sent to a Skive Station where "injuries" that still exist in the tire are removed. The tire is then sent to the Bandag Tire Spinner which is located in an open ended spray booth where the Bandag Solvent is applied to each tire by wiping it on the tire with a rag. Bandag Solvent is used to clean the tires after they have been buffed. The maximum rate of Bandag Solvent applied is 0.05 gallons per hour.

While the tire is still in the booth, Bandag Universal Spray Cement is applied to the tire casing by spray. The spray cement acts as an adhesive to hold the new rubber in place prior to curing. The maximum rate of adhesive applied per hour is 0.93 gallons. This booth vents out the roof at the Northwest corner of the building.

Next, if the tire is in need of minor repairs such as a nail hole or a 2 - 5 inch cut, it is repaired using a patch and rubber cement. There are four (4) repair cement stations. The maximum amount of Bandag C.O.I. Patch Cement and Special Blue Cement brushed on the inside of tires per hour is 0.005 gallons. Periodically, at this stage a small amount of Bandag Universal Spray Cement may be brush applied to the outside of the tire. Both materials are kept in covered containers next to the stations. The tire is then sent to another Skive Station where rubber is filled into the "injuries".

Then the tire goes through what is referred to as the "builders stage" where the tire is actually rebuilt and new, uncured tread is put on the casing. There are two (2) builder stations. Approximately 23-lbs of rubber are added to retread a tire. Again at this stage a small amount of either Universal Spray Cement (adhesive) or Bandag Solvent (cleaner) may be brushed or wiped on the tire, respectively. Both materials are kept in covered containers next to the stations.

After the tire building is completed, the tires are sent through the curing stage where the retreaded tires are prepared in batches (22 tires per batch). Advanced Radial Cure (ARC) bands are clamped into the centers of the tires. A tire curing envelope which is an expandable rubber "coat" is placed around the outside of the uncured tire. This sealing of the envelope is accomplished with the use of what is referred to as an Olsen Enveloper. The envelope aids in pulling a vacuum on the tire. The tires are then sent to one of three (3) electric, curing chambers, each capable of holding twenty-two (22) tires at any given time. Pressure is then applied on the inside of the "coat" or what is referred to as tire pressure at (110 - 115 psi) and on the outside of the tire or what is referred to as chamber pressure at (85 - 86 psi) causing vulcanization to take place. Vulcanization is basically heat treating the tire in order to harden the rubber and make it more durable. The tires are cured using electric heat at (210 - 215°F) and pressure for approximately three hours and 40 minutes. After the vulcanization process is complete the tires are removed from the chamber and the ARC bands are removed from the center of the tires.

The tires are then sent to the final inspection station. Here the tires are inspected to verify the correct casing, tread design, and repairs were made.

Finally, the tires are sent to the Air Spray Painting station where a black strip is painted on the tires using an air spray system. The maximum rate of Black Tire Paint Universal applied per hour is 0.4 gallons.

### **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):

- (1) Space heaters, process heaters, or boilers using the following fuels: natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.  
-Two (2) Armstrong, natural gas-fired space heaters, each rated at 150,000 Btu per hour.
- (2) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (3) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 0.7 kPa: 5 mm Hg: or 0.1 psi measured at 20°C (68°F): the use of which for all cleaners and solvents combined does not exceed 145 gallons per month.
- (4) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (5) Other activities or categories not previously identified:

One (1) Repair Cementing Process which includes four (4) stations used in repairing "injuries" in the tires. Maximum application rate is 0.005 gallons per hour. Emissions from this process are less than the following thresholds:

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

### Existing Approvals

- (a) FESOP 089-7444-00255, issued on September 22, 1997; and expiring on September 22, 2002.
- (b) First Administrative Amendment AAF089-11141-00255, and
- (c) Second Administrative Amendment AAF089-12059-00255.

All conditions from previous approvals were incorporated into this FESOP.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 complete FESOP Renewal application for the purposes of this review was received on January 22, 2002.

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

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	443.5251
PM-10	443.5251
SO <sub>2</sub>	0.0008
VOC	>25
CO	0.0250
NO <sub>x</sub>	0.1251

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Toluene	0.0383
Trichloroethylene	0.2280
TOTAL HAPS	0.2663

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Particulate Matter less than 10 microns (PM10) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 source, issued a FESOP on September 22, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F089-7444-00255; issued on September 22, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Total PTE After Issuance	18.691	7.741	Negligible	25	Negligible	Negligible	*10/25

PM emissions are limited in accordance with 326 IAC 6-3-2. PM10 emissions were set equal to the PM.

VOC emissions are limited to less than 25 tons per year.

SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions are negligible.

\* HAPs emissions are limited to less than 10 tons per year of any individual HAP and less than 25 tons per year of the combination of HAPs.

### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment
SO <sub>2</sub>	Primary Nonattainment
NO <sub>2</sub>	Unclassifiable/Attainment
Ozone	Severe Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

40 CFR Part 81.315 Indiana

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

No facility currently being operated at this source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.540 – 60.548, Subpart BBB, Standards of Performance for the Rubber Tire Manufacturing Industry), because this source does not contain operations which are listed under rubber tire manufacturing.

- (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)

The source has submitted a Preventive Maintenance Plan (PMP) on March 13, 1998. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### 326 IAC 2-3 (Emission Offset)

This source is a major stationary source because it has the potential to emit Particulate Matter less than 10 microns (PM10) at 100 TPY or more and Volatile Organic Compounds (VOCs) at 25 TPY or more. This source predates the 326 IAC 2-3 (Emission Offset) rule. The source has not been reviewed under the requirements of 326 IAC 2-3 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-3.

326 IAC 2-4.1-1 (New source toxics control)

This source is not subject to 2-4.1-1 (New source toxics control), because it is not a major source of hazardous air pollutants that was constructed or reconstructed after July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Lake County and has the potential to emit more than ten (10) tons per year of volatile organic compounds (VOC). Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15<sup>th</sup> of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

The source is in compliance with the required emission statement submittals.

326 IAC 5-1 (Visible 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 twenty percent (20%) 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.

No violations of the opacity standards have been observed at this source.

**State Rule Applicability - Individual Facilities**

326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability)

Pursuant to 326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability), sources or facilities that are: (1) located in the counties listed in section 7 of this rule; (2) but which sources or facilities are not specifically listed in section 7 of this rule; and (3) have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year; shall comply with limitations of applicable sections that follow.

This source is applicable to this rule because it is located in Lake County and has the potential to emit one hundred (100) tons or more of particulate matter per year. However, the source's potential to emit particulate matter is being limited to less than 100 tons per year per their FESOP. The source's particulate emissions will be limited to the particulate emissions as calculated after controls based on information submitted in their application and per the Hammond Air Quality Control Ordinance No. 3522 (as amended).

326 IAC 8-1-6 (New facilities; general reduction requirements)

No facility at this source is applicable to this rule because VOC emissions are limited to less than 25 tons per year.

326 IAC 8-5-4 (Pneumatic rubber tire manufacturing)

This rule does not apply to this source because the source does not contain operations that are listed within the rule.

326 IAC 8-7-2 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties – Applicability)

This rule does not apply to this source because the source does not emit or have the potential to emit volatile organic compounds (VOCs) at levels equal to or greater than twenty-five (25) tons per year (tpy) in Lake County.

### Local Rule Applicability

Hammond Air Quality Control Ordinance No. 3522 (as amended)

Pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended) and Construction and Operation Permits previously issued to the source, the Tire Buffing Machine, Universal Spray Cementing, and Air Spray Painting Processes shall be limited to the potential Particulate Matter less than 10 microns in diameter (PM10) and Volatile Organic Compound emissions after controls.

### Testing Requirements

The Permittee is not required to test this facility by this permit. However, HDEM or IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by HDEM or IDEM, compliance with the limits specified in the permit shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

### 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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The Tire Buffing Machine has applicable compliance monitoring conditions as specified below:

- a) Once per day inspections and once per shift notations of the Tire Buffing Machine exhaust from the B & J Pollution Control System which consists of one (1) flexible hose venting out the South side of the building into a 46,000-lb capacity semitrailer equipped with a furnace-type filter. The source shall assure that the hose and filter are intact and in good working order prior to operation of the Tire Buffing Machine. A record of the observations shall be kept and made available upon request by HDEM or IDEM, OAQ within thirty (30) days after the request is made.
- b) Monthly reports of the process throughputs and PM and PM10 emissions calculations shall be submitted to HDEM and IDEM, OAQ, Compliance Section on a quarterly basis. Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

These monitoring conditions are necessary because the particulate matter control equipment associated with the Tire Buffing Machine must be operated properly to ensure compliance with Hammond Air Quality Control Ordinance No. 3522 (as amended) and 326 IAC 2-8 (FESOP).

2. The Universal Spray Cementing Process has applicable compliance monitoring conditions as specified below:

- a) Once per shift visual emissions notations at the stack are required. A record of the notations shall be kept and made available upon request by HDEM or IDEM, OAQ within thirty (30) days after the request is made.
- b) The dry filters for particulate matter overspray control shall be maintained in accordance with the manufacturer's recommendations and shall be in operation at all times when the cement booth is in operation.
- c) Monthly reports of the quantity of Universal Spray Cement used and the total tons of VOCs emitted for each compliance period shall be submitted to HDEM and IDEM, OAQ, Compliance Section on a quarterly basis. Each compliance period shall be the consecutive twelve (12) month period that includes the most recent month and the previous eleven (11) months.
- d) PM and PM10 emissions calculations shall be submitted to HDEM and IDEM, OAQ, Compliance Section on a quarterly basis. Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

These monitoring conditions are necessary to ensure compliance with the requirements of the Hammond Air Quality Control Ordinance No. 3522 (as amended) and 326 IAC 2-8 (FESOP).

3. The Air Spray Painting process has applicable compliance monitoring conditions as specified below:

- a) Monthly reports of the quantity of paint used and the total tons of VOCs emitted for each compliance period shall be submitted to HDEM and IDEM, OAQ, Compliance Section on a quarterly basis. Each compliance period shall be the consecutive twelve (12) month period that includes the most recent month and the previous eleven (11) months.
- b) PM and PM10 emissions calculations shall be submitted to HDEM and IDEM, OAQ, Compliance Section on a quarterly basis. Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

These monitoring conditions are necessary to ensure compliance with the requirements of 326 IAC 2-8 (FESOP).

### **Conclusion**

The operation of this **Tire Retreading and Repair Shop** shall be subject to the conditions of the attached proposed **(FESOP No.: F089-15270-00255)**.

Appendix A: Source Emissions Calculations

Plant ID: 0255  
 Source Name: Pomp's Tire Service Inc.  
 7930 New Jersey Avenue  
 Hammond, Indiana 46323

PLANT ID NO: 0255  
 INSP DATE: 9/21/01  
 CALC DATE: 5/14/02

NO. OF POINTS: 6  
 NO. OF SEGMENTS: 6

YEAR OF DATA: 2001

Calculations By: Kristina Massey

\*\*NOTES\*\*

EF: EMISSION FACTOR MDR: MAXIMUM DESIGN RATE Ts: STACK DISCHARGE TEMPERATURE  
 CE: CONTROL EFFICIENCY MDC: MAXIMUM DESIGN CAPACITY UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

Point No. 1: Tire Buffing Machine

(Segment No. 1) MDR (mTires/hr): 0.017 STACK ID (DIAM:HEIGHT): 10.3' : 19.6'  
 CNTRL DEV: B & J Spray System YEARLY PROD (mTires/yr): 40.106 FLOWRATE (ACFM): 2000  
 (Equip. installed 12/7/95) Ts(°F): 110  
 PM: 97% C.E.  
 PM10: 99.5% C.E.

PERMITTED OPERATING HRS: 8760 hr/yr

POLLUTANT	EF(lb/mTires)	CE (%)	POTENTIAL TO EMIT (PTE)						ALLOWABLE		(2001 ACTUALS)	
			BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	5882	0.97	99.9940	2,399.8560	437.9737	2.9998	13.1392	#DIV/0!	2.9998	13.1392	117.9517	3.5386
PM10	5882	0.995	99.9940	2,399.8560	437.9737	0.5000	2.1899	#DIV/0!	0.5000	2.1899	117.9517	0.5898
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

\*This point is classed "Major" according to potential PM and PM10 emissions.

Opacity: 326 IAC 5-1-2(2)(B): 20%  
 PM: Hammond AQC Ordinance No. 3522 (as amended)  
 Construction Permit #543 issued 12/7/95  
 Operation Permit #00578

- Emission Factor for Particulate Matter Emissions derived from stack test results at a similar plant.  
 Total Particulate Emissions = 0.14 lb/hr; C.E. = 99.86%; EF back calc.: 0.14/(1-0.9986)/0.017 = 5882 lb/mTires

APC 1-Filter (20' X 20' Aerostar 3-Ply Filter, Series 15/40): Gradation of Shredded Tires performed 7/14/98.  
 PM: 97% C.E. (As per Gradation Report, 3% of chips pass a 100 mesh sieve - 150 micron sieve).  
 PM10: 99.5% C.E. (As per Gradation Report, 0.5% of chips pass a 200 mesh sieve - 75 micron sieve).

Appendix A: Source Emissions Calculations

Point No. 2: Universal Spray Cementing

(Segment No. 1)  
CNTRL DEV: None

MDR (gal/hr): 0.93  
YEARLY PROD (gal/yr): 1605

STACK ID (DIAM:HEIGHT): 2' : 10'  
FLOWRATE (ACFM): 5900  
Ts(°F): 100

(E.F. - See Below)			PERMITTED OPERATING HRS: 8760 hr/yr						ALLOWABLE		(2001 ACTUALS)	
SCC NO. 4-02-007-10			POTENTIAL TO EMIT (PTE)						(lbs/hr)	(TPY)	BEFORE	AFTER
POLLUTANT	EF (lb/gal)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS					CONTROLS	CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	0.798	0	0.7421	17.8114	3.2506	0.7421	3.2506	#DIV/0!	0.7421	3.2506	0.6404	0.6404
PM10	0.798	0	0.7421	17.8114	3.2506	0.7421	3.2506	#DIV/0!	0.7421	3.2506	0.6404	0.6404
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	5.202	0	4.8379	116.1086	21.1898	4.8379	21.1898	N/A	4.8379	21.1898	4.1746	4.1746
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

\*This point is classed "State Registered" according to potential VOC emissions.

PM: Hammond AQC Ordinance No. 3522 (as amended)  
VOC: Hammond AQC Ordinance No. 3522 (as amended)

Manufacturer: Bandag, Inc.

Bandag Universal Spray Cement: VOC content = 86.7% by wt (5.202 lbs/gal)

Density = 6 lbs/gal

13.3% solids (0.798 lbs/gal)

2001 fire's EF changed to 4.4 lb/ton EF not changed in calc's to keep potential as is

-Applied mostly by spray, some brush.

Transfer Efficiency = 85%

Equipment was installed December 7, 1995.

Appendix A: Source Emissions Calculations

Point No. 3: Air Spray Painting

(Segment No. 1)  
CNTRL DEV: None

MDR (gal/hr): 0.4  
YEARLY PROD (gal/yr): 658

STACK ID (DIAM:HEIGHT): No Stack  
FLOWRATE (ACFM):  
Ts(°F):

(E.F. - See Below)			PERMITTED OPERATING HRS: 8760 hr/yr						ALLOWABLE		(2001 ACTUALS)	
SCC NO. 4-02-002-10			POTENTIAL TO EMIT (PTE)									
POLLUTANT	EF (lb/gal)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	1.29	0	0.5160	12.3840	2.2601	0.5160	2.2601	#DIV/0!	0.5160	2.2601	0.4244	0.4244
PM10	1.29	0	0.5160	12.3840	2.2601	0.5160	2.2601	#DIV/0!	0.5160	2.2601	0.4244	0.4244
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	1.3	0	0.5200	12.4800	2.2776	0.5200	2.2776	N/A	0.5200	2.2776	0.4277	0.4277
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

\*This point is classed "State Registered" according to potential VOC emissions.

PM: Hammond AOC Ordinance No. 3522 (as amended)  
VOC: Hammond AOC Ordinance No. 3522 (as amended)

Manufacturer: Stoner, Inc.  
E839 Black Tire Paint(BTP) Universal: VOC content = .8% by wt (0.067 lbs/gal)  
Density = 8.32 lbs/gal  
15.5% solids (1.29 lbs/gal)  
2001 EF changed to 1.3 lb/gal per fire's info (from 0.067)  
-Applied by spray.

Equipment was installed December 7, 1995.

Point No. 4: Bandag Solvent (\*Designated as an Insignificant Activity)

(Segment No. 1)  
CNTRL DEV: None

MDR (gal/hr): 0.05  
YEARLY PROD (gal/yr): 0

STACK ID (DIAM:HEIGHT): No Stack  
FLOWRATE (ACFM):  
Ts(°F):

(E.F. - See Below)			PERMITTED OPERATING HRS: 8760 hr/yr						ALLOWABLE		(2001 ACTUALS)	
SCC NO. 4-02-009-98			POTENTIAL TO EMIT (PTE)									
POLLUTANT	EF (lb/gal)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#DIV/0!	0	0.0000	0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#DIV/0!	0	0.0000	0.0000	0.0000
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	5.82	0	0.2910	6.9840	1.2746	0.2910	1.2746	N/A	0.2910	1.2746	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
HAPs	0.175	0	0.0088	0.2100	0.0383	0.0088	0.0383	N/A	0.0088	0.0383	0.0000	0.0000

\*This point has potential emissions below the State's registration thresholds.

PM: Hammond AOC Ordinance No. 3522 (as amended)  
VOC: Hammond AOC Ordinance No. 3522 (as amended)

Manufacturer: Phillips Petroleum  
Bandag Solvent: VOC content = 100% by wt (5.82 lbs/gal)  
Density = 5.82 lbs/gal  
Toluene 3% by wt (0.175 lbs/gal)

-Material wiped on.

Equipment was installed December 7, 1995.

Appendix A: Source Emissions Calculations

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**Point No. 5: Repair Cementing (\* Designated as an Insignificant Activity)**  
 \*\*\*\*\*

(Segment No. 1)  
 CNTRL DEV: None

MDR (gal/hr): 0.005  
 YEARLY PROD (gal/yr): 0.0

STACK ID (DIAM:HEIGHT): No Stack  
 FLOWRATE (ACFM):  
 Ts(°F):

PERMITTED OPERATING HRS: 8760 hr/yr

(E.F. - See Below)			POTENTIAL TO EMIT (PTE)						ALLOWABLE		(2001 ACTUALS)	
SCC NO. 4-02-007-10			BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE	AFTER
POLLUTANT	EF (lb/gal)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			CONTROLS	CONTROLS
PM	1.69	0	0.0085	0.2028	0.0370	0.0085	0.0370	#DIV/0!	0.0085	0.0370	0.0000	0.0000
PM10	1.69	0	0.0085	0.2028	0.0370	0.0085	0.0370	#DIV/0!	0.0085	0.0370	0.0000	0.0000
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	10.41	0	0.0521	1.2492	0.2280	0.0521	0.2280	N/A	0.0521	0.2280	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
HAPs	10.41	0	0.0521	1.2492	0.2280	0.0521	0.2280	N/A	0.0521	0.2280	0.0000	0.0000

\*This point has potential emissions below the State's registration thresholds.

PM: Hammond AQC Ordinance No. 3522 (as amended)  
 VOC: Hammond AQC Ordinance No. 3522 (as amended)

Manufacturer: Rema Tip Top/North America, Inc.

Bandag C.O.I. Patch Cement and Special Blue Cement: VOC content = 86% by wt (10.41 lbs/gal)

Density = 12.1 lbs/gal

14% solids (1.69 lbs/gal)

Trichloroethylene 86% by wt (10.41 lb/gal)

-Applied by brush.

Equipment was installed December 7, 1995.

\*\*\*\*\*  
**Point No. 6: Two (2) Armstrong Space Heaters (\* Designated as an Insignificant Activity)**  
 \*\*\*\*\*

(Segment No. 1)  
 (Natural Gas Combustion)  
 CNTRL DEV: NONE

MDC (mmBtu/hr): 0.3  
 MDR (mmcft/hr): 0.0003

HEAT CONTENT (Btu/cft): 1,050  
 QTY BURNED (mmcft/yr): 0

STACK ID (DIAM:HEIGHT): ?  
 FLOWRATE (ACFM): ?  
 Ts(°F): ?

PERMITTED OPERATING HRS: 8760 hr/yr

SCC NO. 1-05-001-06			POTENTIAL EMISSIONS						ALLOWABLE		(2001 ACTUALS)	
			BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE	AFTER
POLLUTANT	EF (lbs/mmcft)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			CONTROLS	CONTROLS
PM	3	0	0.0009	0.0206	0.0038	0.0009	0.0038	#VALUE!	0.0009	0.0038	0.0000	0.0000
PM10	3	0	0.0009	0.0206	0.0038	0.0009	0.0038	#VALUE!	0.0009	0.0038	0.0000	0.0000
SOx	0.6	0	0.0002	0.0041	0.0008	0.0002	0.0008	N/A	0.0002	0.0008	0.0000	0.0000
NOx	100	0	0.0286	0.6857	0.1251	0.0286	0.1251	N/A	0.0286	0.1251	0.0000	0.0000
VOC	5.3	0	0.0015	0.0363	0.0066	0.0015	0.0066	N/A	0.0015	0.0066	0.0000	0.0000
CO	20	0	0.0057	0.1371	0.0250	0.0057	0.0250	N/A	0.0057	0.0250	0.0000	0.0000
LEAD	---	0	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!

\*This point has potential emissions below the State's registration thresholds.

Hammond AQC Ordinance No. 3522 (as amended)

Equipment was installed December 7, 1995.

Appendix A: Source Emissions Calculations

**SOURCE TOTALS:**

POLLUTANT	POTENTIAL TO EMIT (PTE)						ALLOWABLE		(2001 ACTUALS)	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE	AFTER
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			CONTROLS	CONTROLS
PM	101.2614	2,430.2747	443.5251	4.2673	18.6906	#DIV/0!	4.2673	18.6906	119.0166	4.6034
PM10	101.2614	2,430.2747	443.5251	1.7674	7.7413	#DIV/0!	1.7674	7.7413	119.0166	1.6546
SOx	0.0002	0.0041	0.0008	0.0002	0.0008	#VALUE!	0.0002	0.0008	0.0000	0.0000
NOx	0.0286	0.6857	0.1251	0.0286	0.1251	#VALUE!	0.0286	0.1251	0.0000	0.0000
VOC	5.7024	136.8582	24.9766	5.7024	24.9766	#VALUE!	5.7024	24.9766	4.6023	4.6023
CO	0.0057	0.1371	0.0250	0.0057	0.0250	#VALUE!	0.0057	0.0250	0.0000	0.0000
HAPs	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

\*This source is class "Major" according to potential PM and PM10 emissions (before controls).

**Overall Source Limits:**

- PM: 19 TPY
- PM10: 8 TPY
- VOC: 25 TPY
- Single HAP: 10 TPY
- Combined HAPs: 25 TPY
- All Other Regulated Pollutants: 100 TPY

.....  
**Insignificant Activities**  
 .....

The source includes the following insignificant activities:

- 1) Space heaters, process heaters, or boilers using the following fuels: natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.  
 -Two (2) Armstrong, natural gas-fired space heaters, each rated at 150,000 Btu per hour.
- 2) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- 3) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 0.7 kPa: 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per month.
- 4) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- 5) Other activities or categories not previously identified:  
 One (1) Repair Cementing Process which includes four (4) stations used in repairing "injuries" in the tires. Maximum application rate is 0.005 gallons per hour.  
 Emissions from this process are less than the following thresholds:  
 Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day  
 Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day