



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 19, 2003

Re: COOPER-STANDARD 033-15942-00013

**From: Paul Dubenetzky, Chief Permits Branch
Office of Air Quality**

Subject: Important Information for Display of a Final Permit

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final permit and supporting materials for the same project. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, please notify the Office of Air Quality at 1-800-451-6027 and ask for the Permits Administration Section.

FNLIB3
8/27/02



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Governor

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Mr. George Hertsel
Cooper - Standard Automotive, Inc.
207 South West Street
Auburn, Indiana 46706

April 8, 2003

Re: Significant Source Modification No:
033-15942-00013

Dear Mr. Hertsel:

Cooper - Standard Automotive, Inc. applied for a Part 70 operating permit on July 9, 1996 for a mixed rubber and molded rubber products manufacturing source. An application to modify the source was received on July 26, 2002. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Eighteen (18) rubber injection molding presses, with a unit ID of 400, each with a maximum capacity of 116 pounds per hour and associated insignificant grinding wheels, with a unit ID of 600, with dust pick-ups that are connected to a header system, which is served by dust collectors that discharge inside the building.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Kristin Clapp, ERG, Morrisville, North Carolina 27560, or call (703) 633-1694 to speak directly to Ms. Clapp. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/KC

cc: File - DeKalb County
U.S. EPA, Region V
DeKalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe



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PART 70 SIGNIFICANT SOURCE MODIFICATION AND MAJOR MODIFICATION UNDER PREVENTION OF SIGNIFICANT DETERIORATION

OFFICE OF AIR QUALITY

**Cooper - Standard Automotive, Inc.
207 South West Street
Auburn, Indiana 46706**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

Source Modification No.: 033-15942-00013	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 8, 2003

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Quarterly Report

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.3 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom mixing and miscellaneous metal and plastic parts and products plant.

Responsible Official:	Plant Manager
Source Address:	207 South West Street, Auburn, Indiana 46706
Mailing Address:	207 South West Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 925-0700
SIC Code:	3061
County Location:	Auburn
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) New Curing Operations (GR-04)
Eighteen (18) rubber injection molding presses, with a unit ID of 400, each with a maximum capacity of 116 pounds per hour and associated insignificant grinding wheels, with a unit ID of 600, with dust pick-ups that are connected to a header system, which is served by dust collectors that discharge inside the building.
- (b) Existing Curing Operations (GR-04)
One (1) rubber curing operation, identified as unit 400, comprised of forty-seven (47) presses, thirty-three (33) of which were installed between 1960 and 1982, eleven (11) of which were added in 1999, and three (3) of which were added in 2002, with a combined maximum throughput of 5,764 pounds of rubber per hour, some with associated finish grinding steps controlled by a dust collector, exhausting through building ventilation.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This portion of the modification to construct eighteen (18) injection molding presses (Unit ID 400) with associated grinding operations (Unit ID 600), one (1) rotary line (Rotary Line), two (2) chain-on-edge lines (COE #7 and COE #8), and one (1) dip line (Dip Line #3) does not involve the addition of any insignificant activities as defined in 326 IAC 2-7-1(21). However, the portion of the modification included in the separate permit will involve the addition of the following insignificant activities: one (1) phosphate line, identified as Phosphate Line #2; one (1) wheelabrator, identified as Wheelabrator #2 (Unit ID 327), and additional color coding operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [40 CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, since no comments were received during the public comment period, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [40 CFR 52.21(r)(2)] [326 IAC 2-2-8]

Pursuant to 40 CFR 52.21(r)(2) and 326 IAC 2-2-8(a)(1), this permit to construct shall become invalid if construction is not commenced within eighteen (18) months after receipt of this approval, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time. IDEM may extend the eighteen (18) month period upon satisfactory showing that an extension is justified.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application or the permit. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application or the permit in a manner that is regulated under the provisions of 326 IAC 2-2, the source may not begin operation until the source modification has been revised pursuant to the provisions of 326 IAC 2-2 and the provisions of 326 IAC 2-1.1-6 and an Operation Permit Validation Letter is issued.
- (c) If actual construction of the emissions units differs from the construction proposed in the application or the permit in a manner that is not regulated under the provisions of 326 IAC 2-2, the source may not begin operation until the source modification has been revised pursuant to the provisions of 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (d) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (e) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (f) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
 - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.

- (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
- (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or 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.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 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 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.
- (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 a minor permit modification 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.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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, 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 Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Northern Regional Office
Telephone Number: 1-800-753-5519 or 219-245-4870
Facsimile Number: 219-245-4877

- (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

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, 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 2-7 and any other applicable rules.
 - (g) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The 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
- (b) 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, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Part 2 MACT Application Submittal Requirement

C.15 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
- (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification 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

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: New Curing Operations (GR-04)

- (a) New Curing Operations (GR-04)
Eighteen (18) rubber injection molding presses, with a unit ID of 400, each with a maximum capacity of 116 pounds per hour and associated insignificant grinding wheels, with a unit ID of 600, with dust pick-ups that are connected to a header system, which is served by dust collectors that discharge inside the building.
- (b) Existing Curing Operations (GR-04)
One (1) rubber curing operation, identified as unit 400, comprised of forty-seven (47) presses, thirty-three (33) of which were installed between 1960 and 1982, eleven (11) of which were added in 1999, and three (3) of which were added in 2002, with a combined maximum throughput of 5,764 pounds of rubber per hour, some with associated finish grinding steps controlled by a dust collector, exhausting through building ventilation.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Rubber Throughput Limitations [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (Prevention of Significant Deterioration), the Permittee shall comply with the following limitations:

- (a) The rubber processed by the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emissions from the transfer and injection molding presses shall not exceed 6.23×10^{-3} pounds per pound rubber. This limit is equivalent to VOC emissions of less than one hundred thirty-one (131) tons per year from the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400), combined.
- (b) The Rubber Compound #17 processed by the eighteen (18) new injection molding presses (Unit 400) shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The aniline emissions from the injection molding presses shall not exceed 1.02×10^{-3} pounds per pound rubber. This limit is equivalent to aniline emissions of less than 0.23 grams per second from the eighteen (18) new injection molding presses (Unit 400).

D.1.2 Particulate Emissions Limitations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the eighteen (18) new injection molding presses (Unit 400) shall not exceed 0.609 pounds per hour each when operating at a process weight rate of 116 pounds per hour. This limitation was calculated using the following.

Interpolation of this data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the forty-seven (47) existing presses (Unit 400) shall not exceed the following limitations when operating at the listed process weight rates:

Press Type	Number of Presses	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Particulate Emission Limitation (lb/hr)
50 Series Injection	11	83	0.042	0.551*
60 Series Injection	23	116	0.058	0.609
70 Series Injection	3	155	0.078	0.739
Rutil Injection Press	1	98	0.049	0.551*
Transfer Press	9	180	0.090	0.817

*Note that pursuant to 326 IAC 6-3-2, the particulate emissions from a process with a process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.3 Record Keeping Requirements

-
- (a) To document compliance with the Condition D.1.1, the Permittee shall maintain records of the rubber processed by Unit 400 and the Rubber Compound #17 processed by the eighteen (18) new injection molding presses.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West Street, Auburn, Indiana 46706
Mailing Address: 207 South West Street, Auburn, Indiana 46706
Source Modification No.: 033-15942-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 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 DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West Street, Auburn, Indiana 46706
 Mailing Address: 207 South West Street, Auburn, Indiana 46706
 Source Modification No.: 033-15942-00013
 Facility: Unit 400
 Parameter: Rubber Throughput
 Limit: The rubber processed by the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West Street, Auburn, Indiana 46706
 Mailing Address: 207 South West Street, Auburn, Indiana 46706
 Source Modification No.: 033-15942-00013
 Facility: Eighteen (18) new injection molding presses
 Parameter: Rubber Compound #17 Throughput
 Limit: The Rubber Compound #17 processed by the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

April 8, 2003

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for a Part 70 Significant Source Modification**

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	Auburn
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	033-15942-00013
Permit Reviewer:	ERG/KC

On February 12, 2003, the Office of Air Quality (OAQ) had a notice published in the Evening Star in Auburn, Indiana, stating that Cooper - Standard Automotive, Inc. had applied for a Part 70 Significant Source Modification to construct eighteen (18) rubber injection molding presses. The notice also stated that OAQ 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Condition B.2 has been revised to reflect that, since no comments were received during the public notice period, the permit is effective immediately upon issuance.

B.2 Effective Date of the Permit [40 CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, ~~if there are~~ **since** no comments ~~were~~ received during the public comment period, this permit becomes effective upon its issuance. ~~If there are comments received during the public comment period, the effective date of this permit will be thirty (30) days after the service of notice of the decision. Three (3) days shall be added to the thirty (30) day period if service of notice is by mail.~~

April 8, 2003

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a
Part 70 Significant Source Modification and
Major Modification Under Prevention of Significant Deterioration**

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	SSM033-15942-00013
Permit Reviewer:	ERG/KC

The Office of Air Quality (OAQ) has reviewed a modification application from Cooper - Standard Automotive, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) New Curing Operations (GR-04)
Eighteen (18) rubber injection molding presses, with a unit ID of 400, each with a maximum capacity of 116 pounds per hour and associated insignificant grinding wheels, with a unit ID of 600, with dust pick-ups that are connected to a header system, which is served by dust collectors that discharge inside the building.

This permit also includes a combined production limit for the existing and new curing equipment. The existing curing equipment is described as follows:

- (b) Existing Curing Operations (GR-04)
One (1) rubber curing operation, identified as unit 400, comprised of forty-seven (47) presses, thirty-three (33) of which were installed between 1960 and 1982, eleven (11) of which were added in 1999, and three (3) of which were added in 2002, with a combined maximum throughput of 5,764 pounds of rubber per hour, some with associated finish grinding steps controlled by a dust collector, exhausting through building ventilation.

Note that this construction is considered one project for all applicability purposes with the construction of the following units which will be included in a separate PSD Significant Source Modification which will be issued later. The construction of the injection molding presses and the following units were not included in the same Significant Source Modification for administrative purposes only. The preliminary BACT determination has been made for the following units, however the source has requested time to look into innovative, more environmentally friendly, pollution prevention techniques to be implemented in lieu of the preliminary BACT determination. The modification can be split up between two permits because each permits meets all the PSD

requirements that a single PSD permit would have. Additionally, the construction of the presses, included in this permit, does not make the production of the coating operations, included in a separate permit, essential. The presses can operate even if the facilities to be included in the separate permit are not constructed.

The units considered to be one project with the construction of the injection molding presses are as follows:

New Coating Operations (GR-05)

- (a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, with a maximum capacity of 500 pieces per gallon and 30 pieces per minute, consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, exhausting to stacks 133 and 134; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour, exhausting to stacks 135 and 136.
- (b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, with a maximum capacity of 500 pieces per gallon and 30 pieces per minute, consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, exhausting to stacks 137 and 138; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour, exhausting to stacks 139 and 140.
- (c) One (1) rotary line, with a unit ID of 326, with a maximum capacity of 500 pieces per gallon and 30 pieces per minute, consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, exhausting to stacks 141 and 142; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour, exhausting to stacks 143 and 144.
- (d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, with a maximum capacity of 515 pieces per gallon and 30 pieces per minute, consisting of the following:
 - (1) Two (2) dip tanks, exhausting to stacks 129 and 130; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.4 million British thermal units per hour, exhausting to stacks 131 and 132.

Note that the maximum throughput associated with each new coating line is based on the worst-case currently known 'jobs' and coating transfer efficiencies as of this date. The maximum capacity has the potential to increase or decrease depending on future customer 'jobs.'

New Insignificant Activities

- (e) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM₁₀, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (1) One (1) wheelabrator, identified as Wheelabrator #2, with a unit ID of 327. [326 IAC 6-3-2]
- (2) One (1) phosphate line, identified as Phosphate Line #2.
- (3) Additional color coding operations.

Included in the permit for the construction of the new coating operations, listed above, will be throughput and input limitations for the new and existing coating operations (GR-05), existing rubber processing operations (GR-01), existing milling operations (GR-02), and existing extruding operations (GR-03).

History

On July 26, 2002, Cooper - Standard Automotive, Inc. submitted an application to the OAQ requesting to add two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, one (1) dip line (Dip Line #3), eighteen (18) rubber injection molding presses, one (1) wheelabrator (wheelabrator #2), and one (1) phosphate line (Phosphate Line #2). Cooper - Standard Automotive, Inc., submitted a Part 70 permit application on July 9, 1996. The Part 70 permit, T033-6253-00013 has not been issued yet. This modification to an existing PSD major source is major because the potential to emit VOC is greater than the thresholds specified in 326 IAC 2-2-1(w).

The modification has been split up into two (2) permits: one (1) for the construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600); and one (1) for the construction of the two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, one (1) dip line (Dip Line #3), one (1) wheelabrator (wheelabrator #2), and one (1) phosphate line (Phosphate Line #2). The construction of all of these units combined will be considered one (1) project with respect to all rule applicability determinations. The construction is being split into two (2) separate permits for administrative purposes only. The source requested that the construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600) be placed in a permit by themselves because the source has a greater need to begin construction on those presses as soon as possible. The need to construct the remaining facilities is not as great. Therefore, the source has requested time to look into innovative, more environmentally friendly, pollution prevention techniques to be implemented in lieu of the preliminary BACT determination made by IDEM, OAQ for the (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). The modification can be split up between two permits because each permits meets all the PSD requirements that a single PSD permit would have. Additionally, the construction of the presses, included in this permit, does not make the production of the coating operations, included in a separate permit, essential. The presses can operate even if the facilities to be included in the separate permit are not constructed.

Included in the permit for the construction of the new coating operations will be throughput and input limitations for the new and existing coating operations (GR-05), existing rubber processing operations (GR-01), existing milling operations (GR-02), and existing extruding operations (GR-03). These limitations will remove and combine existing throughput and input limitations to provide operational flexibility. These limitations will also streamline record keeping and reporting requirements for the source.

Enforcement Issue

There are no enforcement issues with these new emission units.

Stack Summary

The construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600) does not result in the construction of any additional stacks. The construction of the injection molding presses is considered one (1) project with the construction of the two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). The new stacks associated with the chain-on-edge lines, rotary line, and dip line have not been included in this Technical Support Document but will be included in the Technical Support Document for their construction.

Recommendation

The staff recommends to the Commissioner that the Part 70 PSD Significant Source Modification 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 application for the purposes of this review was received on July 26, 2002.

No notice of completeness was mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7). Since the construction of the injection molding presses and associated grinding operators (Unit ID 600) is considered one (1) project, for all rule applicability determinations, with the construction of the chain-on-edge lines, rotary line, and dip line, the calculations show the emissions from all units included in the complete project.

Potential To Emit of Modification

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

This table reflects the PTE before controls of the complete modification including the equipment in this permit (15942) and the future permit for the remainder of the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	58.52
PM-10	58.52
SO ₂	0.01
VOC	1,205.04
CO	1.4
NO _x	1.66

HAP's	Potential To Emit (tons/year)
1,1,1-Trichloroethane	0.14
1,1-Dichloroethene	0.02
1,3-Butadiene	0.09

HAP's	Potential To Emit (tons/year)
2-Butanone	0.09
2-Chloro-1,3-Butadiene	0.08
4-Methyl-2-Pentanone	5.48
Acetaldehyde	0.06
Acetonitrile	0.05
Acetophenone	0.01
Acrylonitrile	0.01
Aniline	9.33
Benzene	0.42
Benzidine	0.04
Bis(2-Ethylhexyl)phthalate	0.11
Carbon Disulfide	5.01
Carbon Tetrachloride	0.79
Carbonyl Sulfide	4.01
Chloroform	0.22
Chloromethane	0.06
o-Cresol	0.94
Chromium	21.38
Cumene	0.02
Di-n-butylphthalate	0.09
Ethylbenzene	65.88
Formaldehyde	1.73
Glycol Ethers	10.34
Hexane	0.29
Isoccatane	0.04
Lead	0.38
Manganese	0.42
Methylene Chloride	0.45
MEK	9.05
MIBK	447.56
Naphthalene	0.02
o-Toluidine	0.04
Phenol	7.51
Propylene Oxide	0.33
Selenium	7.31
Styrene	0.76
t-Butyl Methyl Ether	0.06
Tetrachloroethene	0.02
Toluene	574.68
Xylenes	333.28
TOTAL	1,508.60

Note: These individual HAP emissions are the worst case individual HAPs from a group of worst case rubber compounds and coatings. This is why the total HAPs exceed the VOC emissions listed in the previous table.

Justification for Modification

The Part 70 Operating permit is being modified through a PSD Part 70 Significant Source Modification. The modification is comprised of eighteen (18) rubber injection molding presses and

associated grinding operations (Unit ID 600), two (2) chain-on-edge lines, one (1) rotary line, and one (1) dip line. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) as the potential to emit of VOC from the entire modification is greater than twenty-five (25) tons per year and pursuant to 326 IAC 2-7-10.5(f)(6) as the potential to emit a single HAP from the entire modification is greater than ten (10) tons per year and the potential to emit any combination of HAPs from the entire modification is greater than twenty-five (25) tons per year.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) DeKalb County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	12.1
PM-10	12.1
SO ₂	40.1
VOC	>250
CO	26.3
NOx	39.3

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the TSD for T033-6253-00013, which is not yet issued.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification. This table displays the potential to emit of the entire modification, not just the addition of the injection molding presses, as the emissions from the entire modification are looked at for rule applicability determinations.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	Combined HAPs
18 Rubber Injection Molding Presses (Unit ID 400) and associated grinding (Unit ID 600)	1.14	1.14	0	56.9 ⁴	0	0	27.29 ^{4,5}
Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), Rotary Line (Unit 326)	5.73 ²	5.73 ²	0	Less than 675.1 ¹	0	0	Less than 675.1 ¹
Combustion Sources ³	0.13	0.13	0.01	0.09	1.40	1.66	Neg
Total	7.00	7.00	0.01	756.72	1.40	1.66	714.15
PSD Threshold Level	25	15	40	40	100	40	---

¹ This limit is the anticipated combined limit for the equipment being added during this modification that will be addressed in a future permit (Dip Line #3, COE #7, COE#8, and Rotary Line) and the existing coating operation (GR-05) equipment at the source. After the review of the BACT analysis for this equipment, the limit may be revised.

² This value shows the potential to emit after the fabric filters for COE #7, COE #8, and Rotary Line. The fabric filters will be required by a future permit to control emissions from COE #7, COE #8, and Rotary Line at all times that COE #7, COE #8, and Rotary Line are in operation in order to render the emissions from the entire modification less than fifteen (15) tons of PM10 per year and less than twenty-five (25) tons of PM per year.

³ Combustion emissions are from the natural gas ovens on the new coating lines (Dip Line #3, COE #7, COE #8, and Rotary Line).

⁴ Note that the 27.29 tons per year of HAPs is based on the sum of the worst case individual HAPs. Therefore the sum of the HAPs exceeds the HAPs expected to be emitted when processing any single rubber compound.

⁵ Note that these units, in combination with the 47 existing transfer and injection molding presses, are subject to a rubber throughput limit and a Rubber Compound #17 throughput limit. The 18 new presses and the 47 existing presses shall not process greater than 42,000,000 pounds of rubber, combined, per 12 consecutive month period. The 18 new presses shall not process greater than 15,811,800 pounds of Rubber Compound #17, combined, per 12 consecutive month period. The VOC emissions shall not exceed 6.23x10⁻³ pounds per pound rubber and the aniline emissions shall not exceed 1.02x10⁻³ pounds per pound rubber. These limits are equivalent to VOC emissions less than 131 tons of VOC per year from the 18 new presses and 47 existing presses, combined, and aniline emissions less than 0.23 grams per second from the 18 new presses.

This modification to an existing major stationary source is major because the emissions increase for VOC is more than the PSD significant thresholds. Therefore, pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, the PSD requirements apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.
- (c) This modification is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source. For this modification, the injection molding presses do not have the potential to emit one hundred (100) tons per year of VOC. Additionally, CAM does not apply for the remainder of the facilities involved in this modification, but included in a separate permit for administrative purposes. CAM applicability for the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326) will be discussed in a separate permit.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
 - (1) This rule requires the source to:
 - (A) Submit a Part 1 MACT Application by May 15, 2002; and
 - (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.
 - (2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice challenged the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. The U.S. EPA and Earthjustice filed a settlement agreement on November 26, 2002. Proposed rule amendments based on this settlement agreement were published in the December 9, 2002 *Federal Register*. It appears that U.S. EPA intends to establish a phased schedule for promulgating all of the remaining MACT standards, resulting in four Part 2 MACT Application deadlines. Under the proposed amendments, some Part 2 MACT Applications would be due as early as May 15, 2003.
 - (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable

General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

- (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
- (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
- (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was constructed prior to the PSD rules and was an existing major source upon finalization of the PSD rules. This source is not considered one (1) of the twenty-eight listed source categories. The following units were constructed prior to the PSD rules: COE #1, Ronci Line, Auto Line #1, Dip Line #1, and Hand Line. Dip Line #1 has since been removed.

COE #2 was constructed in 1981 and should have undergone a PSD BACT review. The BACT analysis and accompanying requirements will be included in the other permit for this modification.

COE #3 was constructed in 1985 and limits were accepted to avoid 326 IAC 2-2 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). In 1986, these limits were increased to above 326 IAC 8-1-6 thresholds, but below 326 IAC 2-2 thresholds. Therefore, 326 IAC 8-1-6 BACT was applied. COE #3 was then modified in 1991.

In 1988, COE #4, COE #5, and ID/OD were constructed. Emissions from these units were limited to less than 326 IAC 2-2 and 326 IAC 8-1-6 thresholds in order to render the requirements of these regulations not applicable. In 1991 these limits were increased to above 326 IAC 8-1-6 thresholds and COE #4 and COE #5 were reviewed under 326 IAC 8-1-6 BACT. The source claimed that even though the limits were increased at this time to above PSD thresholds, they netted out of PSD due to the shut down of other units. During the Part 70 permit application process, the source stated that the BACT requirements from 1991 for these units were not compatible with their process. Also, in review of the application, it was determined that the 1991 source modification for COE #3, COE #4, and COE #5 should have triggered PSD for these units and ID/OD #1 which had originally been issued a limit in conjunction with COE #4. As a result the source submitted a PSD BACT analysis in 2001. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

COE #6 was constructed in 1991 and permitted as a PSD minor source. At this time, 326 IAC 8-1-6 BACT applied. As part of the Part 70 permitting process, an updated BACT analysis for this unit was submitted. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

In 1999, Auto Line #2 and curing autoclave were constructed. Emissions from both units were limited to render the requirements of 326 IAC 2-2 not applicable.

In 2000, Dip Line #2 was constructed and permitted as an exempt operation.

In 2002, the source received a source modification, 033-14752-00013, to construct three (3) injection molding presses and one (1) transfer molding press. Note that to this date, only the three (3) injection molding presses have been constructed and the source has no intentions of constructing the one (1) transfer molding press. The source accepted limits on this modification to render the requirements of 326 IAC 2-2 not applicable. In this permit, the source has requested a combined voluntary limit on the throughput and emissions from the new and existing curing operations (GR-04). The three (3) injection molding presses and one (1) transfer molding press are part of the curing operations (GR-04). The voluntary limit in this permit will supersede the limit required to render 326 IAC 2-2 not applicable in permit 033-14752-00013. Therefore, the limit in 033-14752-00013 is lifted in this permit and the three (3) injection molding presses are subject to the requirements of 326 IAC 2-2 because the limit has been lifted and they now have a potential to emit greater than forty (40) tons of VOC per year.

The construction of the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600), included in this permit, and the construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), included in a separate permit for administrative purposes, are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the modification to an existing major stationary source has the potential to emit greater than the PSD applicability level of forty (40) tons per year for VOC. The potential to emit of PM and PM10 from the entire modification will be limited to less than twenty-five (25) and fifteen (15) tons per year, respectively, by the other permit which will require that the fabric filters for PM and PM10 control be in operation and control emissions from Dip Line #3, COE #7, COE #8, and Rotary Line at all times that these lines are in operation.

Pursuant to 326 IAC 2-2-3, the source conducted a BACT analysis and submitted a PSD permit application on July 26, 2002, for a Significant Source Modification to permit the construction and operation of the new curing and coating operations. IDEM determined that installing and operating eighteen (18) new injection molding presses and associated grinding operations as well as three (3) existing injection molding presses originally permitted in 033-14752-00013 without add-on control is representative of BACT. See Appendix B for a complete review of the BACT analysis.

Pursuant to 326 IAC 2-2-3 and in order to reduce VOC and HAP (specifically aniline) emissions, the Permittee is required to comply with the following limitations:

- (a) The rubber processed by the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emissions from the transfer and injection molding presses shall not exceed 6.23×10^{-3} pounds per pound rubber. This limit is equivalent to VOC emissions of less than one hundred thirty-one (131) tons per year from the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400), combined.

- (b) The Rubber Compound #17 processed by the eighteen (18) new injection molding presses (Unit 400) shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The aniline emissions from the injection molding presses shall not exceed 1.02×10^{-3} pounds per pound rubber. This limit is equivalent to aniline emissions of less than 0.23 grams per second from the eighteen (18) new injection molding presses (Unit 400). (This limit is necessary to ensure an air quality impact less than 0.5% of the permissible exposure limit for aniline.)

The BACT determination for the chain-on-edge lines, rotary line, and dip line will be included in a separate permit for administrative purposes.

Pursuant to 326 IAC 2-2-4, the source completed an Ambient Ozone Impact Analysis which indicates that emissions from the proposed modification do not have a significant impact on the air quality of the surrounding area. See Appendix C for a review of the Ambient Ozone Impact Analysis.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The construction of the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600), included in this permit, and the construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), included in a separate permit for administrative purposes, is not subject to the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) because 326 IAC 2-4.1 only applies to the construction of a new or reconstructed "process or production unit." A "process or production unit" is defined as "any collection of structures and/or equipment, that processes, assembles, applies, or otherwise uses material inputs to produce or store an intermediate or final product. A single facility may contain more than one process or production unit." The new units that are part of this modification do not constitute a "process or production unit" because they cannot, by themselves or as a group, produce a product or intermediate. The existing "process or production lines" will not be considered reconstructed because less than fifty percent (50%) of the fixed capital cost of a comparable entirely new emissions unit will not be spent.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600) shall be limited to 0.609 pounds per hour each when operating at a process weight rate of 116 pounds per hour. This limitation was calculated using the following.

Interpolation of this data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the forty-seven (47) existing presses (Unit 400) shall not exceed the following limitations when operating at the listed process weight rates:

Press Type	Number of Presses	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Particulate Emission Limitation (lb/hr)
50 Series Injection	11	83	0.042	0.551*
60 Series Injection	23	116	0.058	0.609
70 Series Injection	3	155	0.078	0.739
Rutil Injection Press	1	98	0.049	0.551*
Transfer Press	9	180	0.090	0.817

*Note that pursuant to 326 IAC 6-3-2, the particulate emissions from a process with a process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.

Note that the 326 IAC 6-3-2 requirements for the other facilities that are part of this modification (two (2) chain-on-edge lines, one (1) rotary line, one (1) dip line, and the insignificant activities) will be included in a separate permit and Technical Support Document.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The construction of the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600) is subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds) because this operation has the potential to emit greater than twenty-five (25) tons per year VOC. Pursuant to 326 IAC 8-1-6, the construction of these units must reduce VOC emissions using the Best Available Control Technology (BACT). This requirement will be satisfied by complying with 326 IAC 2-2-3 (Prevention of Significant Deterioration). IDEM determined that installing and operating eighteen (18) injection molding presses without add-on control is representative of BACT. See Appendix B for a complete review of the BACT analysis.

Note that the 326 IAC 8-1-6 requirements for the other facilities that are part of this modification (two (2) chain-on-edge lines, one (1) rotary line, one (1) dip line, and the insignificant activities) will be included in a separate permit and Technical Support Document.

326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)

This modification is not subject to 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing) because this source does not manufacture tires.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This modification is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because these are new units that were not constructed after October 7, 1974 and prior to January 1, 1980.

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

This modification is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because the source is not located in Lake, Porter, Clark, or Floyd County.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

No compliance monitoring is required for the eighteen (18) injection molding presses and associated grinding operations because no NSPS or NESHAP applies, no limit was accepted to render the requirements of any rule not applicable, the presses have no control device, and actual emissions are low. However, record keeping and reporting of the rubber throughput and the Rubber Compound #17 throughput is required.

Note that the compliance monitoring requirements for the other new facilities that are part of this modification (two (2) chain-on-edge lines, one (1) rotary line, one (1) dip line, and the insignificant activities) will be included in a separate permit and Technical Support Document. Compliance monitoring requirements for the existing facilities (rubber extrusion operation (GR-03), rubber mixing operations (GR-01), rubber milling operations (GR-02), coating operations (GR-05), and part color coding operations) included in group limits with new equipment will also be included in the other permit and Technical Support Document.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-15942-00013.

Appendix A: Emission Calculations
Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-15942-00013
Pit ID: 033-00013
Reviewer: ERG/KC
Date: 9/25/02

Combined Curing Operation (Unit 400) - VOC and HAP

Total Potential Throughput = 68,783,520 lb rubber/yr [68,783,520 = (116*18*8760)+(5764*8760)]
 Total Limited Throughput = 42,000,000 lb rubber/yr

Chemical Name	CAS #	Emission Factor (lb/lb rubber)	Maximum Emissions (ton/yr)	Limited Emissions (ton/yr)
Total VOC		6.23E-03	214.26	130.83
1,1,1-Trichloroethane	71-55-6	1.51E-05	0.52	0.32
1,1-Dichloroethene	75-35-4	1.96E-06	0.07	0.04
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	0.00	0.00
1,3-Butadiene	106-99-0	9.42E-06	0.32	0.20
1,4-Dichlorobenzene	106-46-7	5.42E-08	0.00	0.00
2-Butanone	78-93-3	9.92E-06	0.34	0.21
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	0.31	0.19
2-Methylphenol	95-48-7	1.17E-07	0.00	0.00
4-Methyl-2-Pentanone	108-10-1	5.99E-04	20.60	12.58
Acetaldehyde	75-07-0	6.69E-06	0.23	0.14
Acetonitrile	75-05-8	5.47E-06	0.19	0.11
Acetophenone	98-86-2	1.50E-06	0.05	0.03
Acrylonitrile	107-13-1	1.33E-06	0.05	0.03
Aniline	62-53-3	1.02E-03	35.08	21.42
Benzene	71-43-2	1.06E-06	0.04	0.02
Benzidine	92-87-5	4.53E-06	0.16	0.10
Biphenyl	92-52-4	3.06E-07	0.01	0.01
bis(2-Ethylhexyl)phthalate	117-81-7	1.15E-05	0.40	0.24
Carbon Disulfide	75-15-0	5.48E-04	18.85	11.51
Carbonyl Sulfide	463-58-1	4.39E-04	15.10	9.22
Chloromethane	74-87-3	6.36E-06	0.22	0.13
Cumene	98-82-8	1.89E-06	0.07	0.04
Di-n-butylphthalate	84-74-2	9.64E-06	0.33	0.20
Dibenzofuran	132-64-9	6.46E-08	0.00	0.00
Dimethylphthalate	131-11-3	1.80E-07	0.01	0.00
Ethylbenzene	100-41-4	4.75E-06	0.16	0.10
Hexane	110-54-3	3.12E-05	1.07	0.66
Isooctane	540-84-1	4.81E-06	0.17	0.10
m-Xylene + p-Xylene		1.22E-05	0.42	0.26
Methylene Chloride	75-09-2	4.87E-05	1.67	1.02
Naphthalene	91-20-3	2.37E-06	0.08	0.05
o-Toluidine	95-53-4	4.36E-06	0.15	0.09
o-Xylene	95-47-6	1.86E-05	0.64	0.39
Phenol	108-95-2	9.68E-07	0.03	0.02
Propylene Oxide	75-56-9	3.63E-05	1.25	0.76
Styrene	100-42-5	8.31E-05	2.86	1.75
t-Butyl Methyl Ether	1634-04-4	6.36E-06	0.22	0.13
Tetrachloroethene	127-18-4	1.98E-06	0.07	0.04
Toluene	108-88-3	2.57E-05	0.88	0.54
Total HAP			102.61	62.66

METHODOLOGY

Emissions (ton/yr) = Emission Factor (lb/lb rubber) * Throughput (lb rubber/yr) / 2000 (lb/ton)

Appendix A: Emission Calculations
Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-15942-00013
Pit ID: 033-00013
Reviewer: ERG/KC
Date: 9/25/02

Curing Operation (Unit 400) - 18 new presses - VOC and HAP

Total Potential Throughput = 18,290,880 lb rubber/yr [18,290,880 = 116*18*8760]

Chemical Name	CAS #	Emission Factor (lb/lb rubber)	Potential Emissions (ton/yr)
Particulate			1.14
Total VOC		6.23E-03	56.98
1,1,1-Trichloroethane	71-55-6	1.51E-05	0.14
1,1-Dichloroethene	75-35-4	1.96E-06	0.02
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	0.00
1,3-Butadiene	106-99-0	9.42E-06	0.09
1,4-Dichlorobenzene	106-46-7	5.42E-08	0.00
2-Butanone	78-93-3	9.92E-06	0.09
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	0.08
2-Methylphenol	95-48-7	1.17E-07	0.00
4-Methyl-2-Pentanone	108-10-1	5.99E-04	5.48
Acetaldehyde	75-07-0	6.69E-06	0.06
Acetonitrile	75-05-8	5.47E-06	0.05
Acetophenone	98-86-2	1.50E-06	0.01
Acrylonitrile	107-13-1	1.33E-06	0.01
Aniline	62-53-3	1.02E-03	9.33
Benzene	71-43-2	1.06E-06	0.01
Benzidine	92-87-5	4.53E-06	0.04
Biphenyl	92-52-4	3.06E-07	0.00
bis(2-Ethylhexyl)phthalate	117-81-7	1.15E-05	0.11
Carbon Disulfide	75-15-0	5.48E-04	5.01
Carbonyl Sulfide	463-58-1	4.39E-04	4.01
Chloromethane	74-87-3	6.36E-06	0.06
Cumene	98-82-8	1.89E-06	0.02
Di-n-butylphthalate	84-74-2	9.64E-06	0.09
Dibenzofuran	132-64-9	6.46E-08	0.00
Dimethylphthalate	131-11-3	1.80E-07	0.00
Ethylbenzene	100-41-4	4.75E-06	0.04
Hexane	110-54-3	3.12E-05	0.29
Isooctane	540-84-1	4.81E-06	0.04
m-Xylene + p-Xylene		1.22E-05	0.11
Methylene Chloride	75-09-2	4.87E-05	0.45
Naphthalene	91-20-3	2.37E-06	0.02
o-Toluidine	95-53-4	4.36E-06	0.04
o-Xylene	95-47-6	1.86E-05	0.17
Phenol	108-95-2	9.68E-07	0.01
Propylene Oxide	75-56-9	3.63E-05	0.33
Styrene	100-42-5	8.31E-05	0.76
t-Butyl Methyl Ether	1634-04-4	6.36E-06	0.06
Tetracloroethene	127-18-4	1.98E-06	0.02
Toluene	108-88-3	2.57E-05	0.24
Total HAP			27.29

METHODOLOGY: Emissions (ton/yr) = Emission Factor (lb/lb rubber) * Throughput (lb rubber/yr) / 2000 (lb/ton)

Limited Aniline Emissions

Compound #17 Throughput (lb/yr)	Compound #17 Aniline	Aniline Emissions*	Aniline Emissions*	Aniline Emissions
15,811,800	1.02E-03	1.84	8.04	0.23

*Emissions include aniline emissions from the other rubber compounds in addition to the emissions from Compound #17.

Note that as the aniline emissions from Compound #17 are the worst-case, only the Compound #17 emission factor was used to determine the emissions of aniline (g/s).

Appendix A: Emission Calculations
Coating Operation Emissions (GR-05) - VOC Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-15942-00013
Pit ID: 033-00013
Reviewer: ERG/KC
Date: 9/25/02

Dip Line #3 (Unit 323)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
7326 - Primer	7.38	82.90%	0%	82.9%	0.00%	8.77%	0.00194	1800	6.12	6.12	21.38	513.20	93.66	0.00	69.76	100%
7329 - Primer	7.45	82.90%	0%	82.9%	0.00%	Unknown	0.00194	1800	6.18	6.18	21.59	518.07	94.55	0.00	NA	100%
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.00%	Unknown	0.00260	1800	6.64	6.64	31.05	745.31	136.02	0.00	NA	100%
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.00%	10.86%	0.00260	1800	6.50	6.50	30.37	728.90	133.02	0.00	59.82	100%

Worst Case Combination of Primer and Adhesive

230.57
0.00

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	12.35	75%	90%	1.23	1.32
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82

Worst Case Combination of Primer and Adhesive or Worst Case Top Coat

305.80
20.36
2.04

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82

Worst Case Combination of Primer and Adhesive or Worst Case Top Coat

305.80
16.53
1.65

Coating Operation Emissions (GR-05) - VOC Emissions Continued

Rotary Line (Unit 326)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	12.35	75%	90%	1.23	NA
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat													305.80	20.36	2.04			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)*(1-Board Efficiency)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
 Coating Operation Emissions (GR-45) - HAP Emissions
 Company Name: Cooper - Standard Automotive, Inc.
 Address City IN Zip: 207 South West Street, Auburn, Indiana 46705
 Permit Number: SS0033-15942-0003
 PU ID: 03-0001
 Reviewer: ERG/KC
 Date: 9/25/02

Dip Line #3 (Unit 323)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	o-Cresol Emissions (ton/yr)	Phenol Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Lead Emissions (ton/yr)	Benzene Emissions (ton/yr)	Chloroform Emissions (ton/yr)	Selenium Emissions (ton/yr)			
7326 - Primer	7.38	0.0019	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	91.31	0.19	0.68	1.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7329 - Primer	7.45	0.0019	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	88.07	0.00	1.53	0.00	1.53	5.35	0.08	0.08	0.08	0.00	0.00				
7362 - Adhesive	7.67	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	2.50	19.15	117.11	0.08	0.00	0.00	0.00				
7678 - Adhesive	8.00	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.91%	0.00	0.00	0.00	0.00	0.00	11.90	62.58	0.00	0.00	0.00	0.00	1.49				
Worst Case Combination of Primer and Adhesive																																
0.08 91.31 0.19 1.53 1.85 13.43 67.93 117.18 0.16 0.08 0.08 0.00 1.49																																

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachloride (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Glycol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)			
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	118.75	0.25	0.88	2.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	1.99	0.00	1.99	6.96	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7365 - Primer	9.60	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.60%	0.00%	0.00%	0.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.57	0.00		
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.12	0.14		
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00			
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
7642 - Adhesive	7.82	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7642 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																																						
0.76 118.75 0.25 1.99 2.40 17.47 68.35 152.42 0.21 0.10 0.11 0.11 1.94 4.97 7.12 0.14																																						

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachloride (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Glycol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)		
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	118.75	0.25	0.88	2.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	1.99	0.00	1.99	6.96	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.12	0.14	
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00		
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
7642 - Adhesive	7.82	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7642 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																																					
0.13 118.75 0.25 1.99 2.40 17.47 68.35 152.42 0.21 0.10 0.11 0.11 1.94 6.40 7.12 0.14																																					

Rotary Line (Unit 326)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachloride (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Glycol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%</																											

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-15942-00013
Plt ID: 033-00013
Reviewer: ERG/KC
Date: 9/25/02

Combined
 Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

3.8

33.3

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.13	0.13	0.01	1.66	0.09	1.40

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-15942-00013
Plt ID: 033-00013
Reviewer: ERG/KC
Date: 9/25/02

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.495E-05	1.997E-05	1.248E-03	2.996E-02	5.659E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.322E-06	1.831E-05	2.330E-05	6.325E-06	3.495E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) DETERMINATION

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	SSM033-15942-00013
Permit Reviewer:	ERG/KC

BACT History for New and Existing Units Affected by this Permit

This source was constructed prior to the PSD rules and was an existing major source upon finalization of the PSD rules. This source is not considered one (1) of the twenty-eight (28) listed source categories. The following units were constructed prior to the PSD rules: COE #1, Ronci Line, Auto Line #1, Dip Line #1, and Hand Line. Dip Line #1 has since been removed.

COE #2 was constructed in 1981 and should have undergone a PSD BACT review. The BACT analysis and accompanying requirements will be included in the other permit for this modification.

COE #3 was constructed in 1985 and limits were accepted to avoid 326 IAC 2-2 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). In 1986, these limits were increased to above 326 IAC 8-1-6 thresholds, but below 326 IAC 2-2 thresholds. Therefore, BACT was applied to comply with 326 IAC 8-1-6 BACT. COE #3 was then modified in 1991.

In 1988, COE #4, COE #5, and ID/OD were constructed. Emissions from these units were limited to less than 326 IAC 2-2 and 326 IAC 8-1-6 thresholds in order to render the requirements of these regulations not applicable. In 1991 these limits were increased to above 326 IAC 8-1-6 thresholds and BACT was applied to COE #4 and COE #5 to comply with 326 IAC 8-1-6. The source claimed that even though the limits were increased at this time to above PSD thresholds, they netted out of PSD due to the shut down of other units. During the Part 70 permit application process, the source stated that the BACT requirements from 1991 for these units were not compatible with their process. Also, in review of the application, it was determined that the source did not net out of PSD for the 1991 source modification for COE #4 and COE #5 and PSD should have been triggered for these units, including ID/OD #1 which had originally been issued a limit in conjunction with COE #4. As a result the source submitted a PSD BACT analysis in 2001. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

COE #6 was constructed in 1991 and permitted as a PSD minor modification. At this time, 326 IAC 8-1-6 BACT applied. As part of the Part 70 permitting process, an updated BACT analysis for this unit was submitted. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

In 1999, Auto Line #2 and curing autoclave were constructed. Emissions from both units were limited to render the requirements of 326 IAC 2-2 not applicable.

In 2000, Dip Line #2 was constructed and permitted as an exempt operation.

In 2002, the source received a source modification, 033-14752-00013, to construct three (3) injection molding presses and one (1) transfer molding press. Note that to this date, only the three (3) injection molding presses have been constructed and the source has no intentions of constructing the one (1) transfer molding press. The source accepted limits on this modification to render the requirements of 326 IAC 2-2 not applicable. In this permit, the source is subject to a combined limit on the throughput and emissions from the new and existing curing operations (GR-04). The three (3) injection molding presses and one (1) transfer molding press are part of the curing operations (GR-04). The limit in this permit will supersede the limit required to render 326 IAC 2-2 not applicable in permit 033-14752-00013. Therefore, the limit in 033-14752-00013 is lifted in this permit and the three (3) injection molding presses are subject to the requirements of 326 IAC 2-2 because the limit has been lifted and they now have a potential to emit greater than forty (40) tons of VOC per year.

This PSD permit allows for the construction of eighteen (18) rubber injection molding presses (Unit 400). These units are subject to the requirements of 326 IAC 8-1-6 and 326 IAC 2-2. The BACT determination for these units is included in this document. The construction of these presses is considered one (1) project with the construction of COE #7 (Unit 324), COE #8 (Unit 325), Rotary Line (Unit 326), and Dip Line #3 (Unit 323), which will be included in another permit for administrative purposes only. The BACT determination for the chain-on-edge lines, Rotary line, and Dip line will be included in Appendix B of the separate permit.

BACT ANALYSIS FOR THE NEW INJECTION MOLDING PRESSES AND THREE EXISTING INJECTION MOLDING PRESSES ORIGINALLY PERMITTED IN 033-14752-00013

The Indiana Department of Environmental Management (IDEM) has performed the following federal BACT review for a major modification to an existing molded rubber products manufacturing source operated by Cooper - Standard Automotive, Inc. (Cooper-Standard), located in Auburn, Indiana. Cooper-Standard's operations consists of metal preparation, rubber mixing, milling, extrusion, rubber to metal/plastic bonding operations, part color coding, and curing. This modification includes the construction of eighteen (18) rubber injection molding presses and associated grinding operations. This modification is considered one (1) project with the construction of two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). The following BACT analysis is for these injection molding presses while the BACT analysis accompanying a separate permit will discuss the chain-on-edge lines, rotary line, and dip line.

The following will be constructed as part of the modification covered in this permit (033-15942-00013):

Eighteen (18) rubber injection molding presses, with a unit ID of 400, each with a maximum capacity of 116 pounds per hour and associated insignificant grinding wheels, with a unit ID of 600, with dust pick-ups that are connected to a header system, which is served by dust collectors that discharge inside the building.

The source is located in Dekalb County which is designated as attainment or unclassifiable for all criteria pollutants and lead. Based upon emission calculations completed by IDEM and the source, the modification, which includes the injection molding presses, included in this permit, and the chain-on-edge lines, rotary line, and dip line, all included in a separate permit, exceeds the PSD significant threshold levels stated in 326 IAC 2-2-1 for VOC. Therefore, VOC was reviewed pursuant to the PSD Program (326 IAC 2-2 and 40 CFR 52.21). The PSD Program requires a BACT review and air quality modeling. BACT is

an emission limitation based on the best available degree of reduction of each pollutant subject to the PSD requirements. IDEM conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies by control effectiveness;
- (4) Evaluate the most effective controls and document the results; and
- (5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, and/or operational limitations.

The BACT determination is based on the following information:

- (1) The EPA RACT/BACT/LAER (RBLCL) Clearinghouse;
- (2) EPA, State, and Local air quality permits and applications; and
- (3) A compilation of control technologies provided by vendors/suppliers.

BACT DETERMINATION

The VOC emissions generated from the proposed modification at the Cooper-Standard source in Auburn are associated with surface coating operations and injection molding operations. A discussion of the surface coating operations will be included in a separate permit while a discussion of the injection molding operations is included in this permit. Presses that are used in the rubber manufacturing industry have not been required to utilize air pollution control measures in the past to comply with BACT. This is also true for the development of the MACT standard for the tire manufacturing industry. The MACT standard addresses several processes associated with manufacturing rubber tires and retreads, but there are no standards that apply to curing (the use of presses). The equations that have been developed to demonstrate compliance with this standard specifically focus on computing the HAP emissions prior to the curing process. For this reason, it is reasonable that installing injection molding presses without add-on controls is representative of BACT.

However, for purposes of completeness, typical VOC add-on controls were investigated as possible means of controlling the VOC emissions from the presses. Two types of controls were investigated: thermal oxidation and catalytic incineration.

Thermal Oxidation

The use of thermal oxidation may be technically feasible, however, it is not cost effective and is impractical for a number of reasons. These reasons are discussed below:

- The following is the cost analysis for both recuperative and regenerative thermal oxidation. A summary of the cost analysis can be viewed in Appendix E. The cost are presented according to three different control scenarios. Option 1 describes the scenario where one individual press is controlled by one oxidizer. Option 2 uses one oxidizer to control emissions from the twenty-one presses subject to this PSD BACT review. Option 3 uses one oxidizer to control emissions from all sixty five presses (forty-seven existing and eighteen new).

Recuperative Oxidation

Option	Capture Efficiency (%)	Destruction Efficiency (%)	Overall Control Efficiency (%)	Total Capital Cost (\$)	Total Annual Cost (\$)	VOC Emissions Reduction (ton)	Cos per Ton VOC Removed (\$/ton)
1	85	95	80.75	353,237	258,878	2.58	100,185
2	85	95	80.75	2,275,428	3,403,767	53.70	63,386
3	85	95	80.75	5,327,173	10,774,444	172.81	62,350

Regenerative Oxidation

Option	Capture Efficiency (%)	Destruction Efficiency (%)	Overall Control Efficiency (%)	Total Capital Cost (\$)	Total Annual Cost (\$)	VOC Emissions Reduction (ton)	Cos per Ton VOC Removed (\$/ton)
1	85	95	80.75	806,968	188,762	2.58	73,050
2	85	95	80.75	3,405,363	1,378,919	53.70	25,679
3	85	95	80.75	9,247,965	4,093,080	172.81	23,686

- The emissions from the presses were calculated using AP-42 emission factors. These emission factors include emissions from the opening of the press and the cool-down period of the rubber. Thus, the emissions displayed in the calculations for the presses include emissions from the actual curing press as well as the emissions from any time spent on a table or in the shipping container until the part has completely cooled. For this reason, in order to capture all the emissions displayed in the calculations, an enclosure would be necessary around not only the press, but also the tables, shipping containers, and rubber scrap containers. Without such an enclosure, the 85% capture assumed in the cost analysis could not be achieved.
- Due to the change-out of the various molds that go into a press depending on the part being manufactured and the maintenance requirements of a press, the enclosure would have to be completely removable to allow fork trucks and maintenance personnel to access the front, back, and sides of the press. It could be necessary to remove the enclosure up to three times a day. Additional costs would be associated with the downtime.
- Storage space would be necessary inside the enclosure to allow for multiple containers of parts and scrap rubber to cool completely in order to achieve a high capture efficiency.
- The proposed presses will not be located in one area. Therefore, it would be impossible to construct one enclosure to encompass the twenty-one presses subject to PSD or to encompass

all presses at the source.

- The oxidizer needed for Option 1 would be approximately 24 feet by 12 feet and weigh approximately 40,000 pounds. The oxidizer needed for Option 2 would be approximately 60.5 feet by 49.5 feet and weigh approximately 70,000 pounds. The oxidizer necessary for Option 3 would be at least two times the size and weight of the oxidizer for Option 2.
- The oxidizer for Option 1 could be supported on an independent platform above the roof of the building or could be installed on the ground. However, realistic costs have not been obtained for installing the oxidizer on a platform above the ground. Installing the unit on the ground would not be practical at this plant because there is not currently enough area outside to install the units. The surrounding area is comprised of the shipping department and employee parking. With the size of the units, installing it in the shipping area would require the shipping area to move as there would not be enough room for the area to operate. Installing the unit in the parking area would result in the need for a parking structure as the parking area is currently 90% full.

Catalytic Incineration

Catalytic incineration is not technically feasible for two reasons: 1) the emission rate from each press can vary dramatically due to batch processing; and 2) there are many different constituents in rubber compounds that would poison or mask the catalyst.

This Cooper-Standard source is considered a 'job shop,' which lends to the operations being largely a batch process. The source processes between 500 and 600 parts annually of varying size and type. The rubber compounds used also varies. The rubber used per part can vary from less than one pound to over ten pounds depending on the part produced. This results in varying VOC emission rates. In order for catalytic incinerators to operate effectively, a stable emission stream would be needed.

Catalysts have been developed that can tolerate almost any single compound. The types of compounds in the rubber at this source vary greatly due to the batch nature of the process. It would be nearly impossible to find a catalyst that could handle all the compounds at the source. Additionally, lead, arsenic, and phosphorous are generally considered poisons for most oxidation catalysts. Cooper-Standard uses each of these compounds.

BACT Selection

Injection Molding Presses

- No control

IDEM has determined that installing the presses without add-on control equipment would be representative of BACT. The justification for operating the presses without control is based on what has been the industry standard. There have been no requirement that presses which are used in the tire manufacturing industry of the rubber product manufacturing industry include add-on controls in the past. Additionally, in the MACT standard addressing the rubber tire industry, there are no standards that apply to curing (the use of presses).

Pursuant to 326 IAC 2-2-3 and in order to reduce VOC and HAP (specifically aniline) emissions, the Permittee is required to comply with the following limitations:

- (a) The rubber processed by the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emissions from the transfer and injection molding presses shall not exceed 6.23×10^{-3} pounds per pound rubber. This limit is equivalent to VOC emissions of less than one hundred thirty-one (131) tons per year from the eighteen (18) new injection molding presses (Unit 400) and the existing forty-seven (47) transfer and injection molding presses (Unit 400), combined.

- (b) The Rubber Compound #17 processed by the eighteen (18) new injection molding presses (Unit 400) shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The aniline emissions from the injection molding presses shall not exceed 1.02×10^{-3} pounds per pound rubber. This limit is equivalent to aniline emissions of less than 0.23 grams per second from the eighteen (18) new injection molding presses (Unit 400), combined.

Air Quality Analysis**Source Background and Description**

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	SSM033-15942-00013
Permit Reviewer:	ERG/KC

Introduction

Cooper - Standard Automotive, Inc. (Cooper - Standard) has applied for a Prevention of Significant Deterioration (PSD) permit to modify a molded rubber products manufacturing source near Auburn in DeKalb County, Indiana. The site is located at Universal Transverse Mercator (UTM) coordinates 662000.0 East and 4580500.0 North. The proposed facility would consist of platen curing operations. DeKalb County is designated as attainment for the National Ambient Air Quality Standards. These standards for Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), Carbon Monoxide (CO), and Particulate Matter less than 10 microns (PM₁₀) are set by the United States Environmental Protection Agency (U.S. EPA) to protect the public health and welfare.

Law Engineering and Environmental Services, Inc. prepared the air quality analysis while Cooper - Standard prepared the PSD permit application for Cooper - Standard. The permit application was received by the Office of Air Quality (OAQ) on July 26, 2002. This document provides OAQ's Air Quality Modeling Section's review of the PSD permit application including an air quality analysis performed by the OAQ.

Air Quality Analysis Objectives

The OAQ review of the air quality impact analysis portion of the permit application will accomplish the following objectives:

- (a) Establish which pollutants require an air quality analysis based on source emissions.
- (b) Conduct a three-tiered ozone impact analysis.
- (c) Perform an analysis of any air toxic compound for the health risk factor on the general population.
- (d) Perform a brief qualitative analysis of the source's impact on general growth, soils, vegetation, endangered species and visibility in the impact area with emphasis on any Class I areas. The nearest Class I area is Kentucky's Mammoth Cave National Park which is 450 kilometers from the Cooper - Standard site in DeKalb County, Indiana.

Summary

Cooper - Standard has applied for a PSD construction permit to construct and operate a molded rubber products manufacturing source in Auburn in DeKalb County, Indiana. The PSD application was prepared by Claw Engineering and Environmental Services, Inc. DeKalb County is currently designated as attainment

for all criteria pollutants. Emission rates for Volatile Organic Compounds(VOC) and Hazardous Air Pollutants (HAPS) associated with the facility exceeded significant emission rates established in state and federal law, thus requiring air quality modeling. An ozone analysis did not indicate any adverse impact from Cooper - Standard. OAQ conducted Hazardous Air Pollutant (HAPs) modeling and no HAP 8-hour maximum concentrations modeled above 0.5% of each Permissible Exposure Limit (PEL). There was no impact review conducted for the nearest Class I area, which is Mammoth Cave National Park in Kentucky. Class I analysis is required only if a source is located less than 100 kilometers (61 miles) from the nearest Class I area. An additional impact analysis on the surrounding area was conducted and no significant impact on economic growth, soils, vegetation, federal and state endangered species or visibility from the Cooper - Standard was expected.

Part A - Pollutants Analyzed for Air Quality Impact

Indiana Administrative Code (326 IAC 2-2) PSD requirements apply in attainment and unclassifiable areas and require an air quality impact analysis of each regulated pollutant emitted in significant amounts by a new major stationary source or modification. Significant emission levels for each pollutant are defined in 326 IAC 2-2-1. VOCs and HAPS will be emitted from Cooper - Standard and an air quality analysis is required for VOCs and HAPS, which exceeded their significant emission rates.

TABLE 1 – Cooper - Standard Significant Emission Rates (tons/yr)		
Pollutant	Maximum Allowable Emissions	Significant Emission Rate
VOC (ozone)	671	40.0

Significant emission rates are established to determine whether a source is required to conduct an air quality analysis. If a source exceeds the significant emission rate for a pollutant, air dispersion modeling is required for that specific pollutant. A modeling analysis for each pollutant is conducted to determine whether the source modeled concentrations would exceed significant impact levels. Modeled concentrations below significant impact levels are not required to conduct further air quality modeling. Modeled concentrations exceeding the significant impact level would be required to conduct more refined modeling which would include source inventories and background data. These procedures are defined in *AGuidelines for Air Quality Maintenance Planning and Analysis, Volume 10, Procedures for Evaluating Air Quality Impacts of New Stationary Sources* October 1977, U.S. EPA Office of Air Quality Planning and Standards (OAQPS).

Part B - Ozone Impact Analysis

Ozone formation tends to occur in hot, sunny weather when NOx and VOC emissions photochemically react to form ozone. Many factors such as light winds, hot temperatures, and sunlight are necessary for higher ozone production. As per OAQ instruction, Law Engineering and Environmental Services submitted its own ozone transport analysis from Cooper - Standard. The results of the RPM - IV and ISC -3 models show that any potential plume emitted from the facility would fall out to the northeast and relatively close to the facility.

OAQ Three-Tiered Ozone Review

OAQ incorporates a three-tiered approach in evaluating ozone impacts from a single source. The first step is to determine how VOC emissions from the new source compare to area-wide VOC emissions from DeKalb County as well as the surrounding counties of Allen, Lagrange, Noble and Stueben. Results

from this analysis show Cooper - Standard's 671 tons/yr of VOC would comprise 1% of the area-wide VOC emissions from point, area, onroad, and nonroad mobile source and biogenic (naturally-occurring emissions from trees, grass and plants) emissions.

A second step is to review historical monitored data to determine ozone trends for an area and the applicable monitored value assigned to an area for designation determinations. This value is known as the design value for an area. The nearest ozone monitor within this region is the Amstutz Road monitor in Allen County, which is 16 kilometers or 10 miles to the southwest of the proposed site and is considered upwind of the proposed facility. The design value for the Amstutz Road monitor for the 1-hour ozone standard over the latest three years of monitoring data is 98 parts per billion (ppb). Wind rose analysis indicates that prevailing winds in the area occur from the southwest and west-southwest during the summer months of May through September when ozone formation is most likely to occur. Ozone impacts from the Cooper - Standard proposed facility would likely fall north, northeast, and east northeast of the facility, away from the existing ozone monitors in the region.

A third step in evaluating the ozone impacts from a single source is to estimate the source individual impact through a screening procedure. The Reactive Plume Model-IV (RPM-IV) has been used in past air quality reviews to determine 1-hour ozone impacts from single VOC/NO_x source emissions. RPM-IV is listed as an alternative model in Appendix B to the 40 Code of Federal Register Part 51, Appendix W *AGuideline on Air Quality Models*. The model is unable to simulate all meteorological and chemistry conditions present during an ozone episode (period of days when ozone concentrations are high). Results from RPM-IV are an estimation of potential ozone impacts. Modeling for 1 hour ozone concentrations was conducted for June 18, 1994 (a high ozone day) to compare to the ozone National Ambient Air Quality Standard (NAAQS) limit. The maximum cell concentration of ozone for each time and distance specified was used to compare to the ambient ozone. OAQ modeling results assumed the short-term emission rates of VOCs are shown in Table 1 at the end of this document. The impact (difference between the plume-injected and ambient modes) from Cooper - Standard was 2.5 ppb early in the plume development. All ambient plus plume-injected modes were below the NAAQS limit for ozone at every time period and every distance. No modeled 1-hour NAAQS violations of ozone occurred.

In summary, ozone formation is a regional issue and the emissions from Cooper - Standard will represent a small fraction of VOC emissions in the area. Ozone contribution from Cooper - Standard emissions is expected to be minimal. Ozone historical data shows that the area monitors have design values below the ozone NAAQS of 120 ppb and the Cooper - Standard ozone impact based on the emissions and modeling will have minimal impact on ozone concentrations in the area.

Part C - Hazardous Air Pollutant Analysis and Results

As part of the air quality analysis, OAQ requests data concerning the emission of 188 Hazardous Air Pollutants (HAPs) listed in the 1990 Clean Air Act Amendments which are either carcinogenic or otherwise considered toxic. These substances are listed as air toxic compounds on the State of Indiana, Department of Environmental Management, Office of Air Quality's construction permit application Form Y. Any HAP emitted from a source will be subject to toxic modeling analysis. The modeled emissions for each HAP are the total emissions, based on assumed operation of 8760 hours per year.

Model Description

The Office of Air Quality review used the Industrial Source Complex Short Term (ISCST3) model, Version 3, dated February 7, 2002 to determine maximum off-property concentrations or impacts for each pollutant. All regulatory default options were utilized in the United States Environmental Protection Agency

(U.S. EPA) approved model, as listed in the 40 Code of Federal Register Part 51, Appendix W A Guideline on Air Quality Models. The Auer Land Use Classification scheme was referred to determine the land use in a 3 kilometer (1.9 miles) radius from the source. The area is considered primarily agricultural, therefore a rural classification was used. The model also utilized the Schulman-Scire algorithm to account for building downwash effects. Stacks associated with the facility are below the Good Engineering Practice (GEP) formula for stack heights. This indicates wind flow over and around surrounding buildings can influence the dispersion of concentrations coming from the stacks. 326 IAC 1-7-3 requires a study to demonstrate that excessive modeled concentrations will not result from stacks with heights less than the GEP stack height formula. These aerodynamic downwash parameters were calculated using U.S. EPA's Building Profile Input Program (BPIP).

Meteorological Data

The meteorological data used in the ISCST3 model consisted of the latest five years of available surface data from the Fort Wayne, Indiana National Weather Service station merged with the mixing heights from Dayton, Ohio Airport National Weather Service station. The 1994 meteorological data was purchased through the National Oceanic and Atmospheric Administration (NOAA) and National Climatic Data Center (NCDC) and preprocessed into ISCST3-ready format with a version of U.S. EPA's PCRAMMET.

Receptor Grid

Ground-level points (receptors) surrounding the source are input into the model to determine the maximum modeled concentrations that would occur at each point. OAQ modeling utilized receptor grids out to 2 kilometers (1.24 miles) for all pollutants. Dense receptor grids surround the property with receptors spaced every 100 meters (328 feet) out to 1 kilometer (0.62 miles), receptors spaced every 500 meters (1640 feet) to 2 kilometers. Discrete receptors were placed 100 meters or 328 feet apart on Cooper - Standard property lines.

Modeling Results

OAQ performed toxic modeling using the ISCST3 model for all HAPs. Maximum 8-hour concentrations were determined and the concentrations were recorded as a percentage of each HAP Permissible Exposure Limit (PEL). The PELs were established by the Occupational Safety and Health Administration (OSHA) and represent a worker's exposure to a pollutant over an 8-hour work day or a 40-hour work week. In Appendix D, the results of the HAP analysis with the emission rates, modeled concentrations and the percentages of the PEL for each HAP are listed. No HAPs concentrations were modeled above 0.5% of their respective PELs. The 0.5% of the PEL represents a safety factor of 200 taken into account when determining the health risk of the general population. It should be noted that all emissions are based on the Best Available Control Technology (BACT) determination and other limitations resulting from the OAQ review of the application.

Part D - Additional Impact Analysis

PSD regulations require additional impact analysis be conducted to show that impacts associated with the facility would not adversely affect the surrounding area.

Economic Growth and Impact of Construction Analysis

Minimal construction workforce growth is expected and Cooper - Standard will employ people selected from the local and regional area once the facility is operational. Secondary emissions are not

expected to significantly impact the area as all roadways will be paved. Industrial and residential growth is predicted to have negligible impact in the area since it will be dispersed over a large area and new home construction is not expected to significantly increase. Any commercial growth, as a result of the proposed facility, will occur at a gradual rate and will be accounted for in the background concentration measurements from air quality monitors. A minimal number of support facilities will be needed. There will be no adverse impact in the area due to industrial, residential or commercial growth.

Soils Analysis

Secondary NAAQS limits were established to protect general welfare, which includes soils, vegetation, animals and crops. Soil types in Dekalb County are of the Blount, Morley, Pewamo Association of which is predominately clayey glacial till (Soil Survey of Dekalb County, U.S. Department of Agriculture). The general landscape consists of Tipton Till Plain or flat to gently rolling terrain (1816-1966 Natural Features of Indiana - Indiana Academy of Science). According to the HAPs analysis, the soils will not be adversely affected by the facility.

Vegetation Analysis

Due to the agricultural nature of the land, crops in the Dekalb County area consist mainly of corn, wheat, oats, soybeans and hay (1992 Agricultural Census for Dekalb County). The maximum modeled concentrations of Cooper - Standard for HAPS are well below the threshold limits necessary to have adverse impacts on surrounding vegetation such as autumn bent, nimblewill, barnyard grass, bishopscap and horsetail milkweed (Flora of Indiana - Charles Deam). Livestock in the county consist mainly of hogs, beef and milk cows, sheep and chickens (1992 Agricultural Census for Dekalb County) and will not be adversely impacted from the modification. Trees in the area are mainly Beech, Maple, Oak and Hickory. These are hardy trees and due to the insignificant modeled concentrations, no significant adverse impacts are expected.

Federal and State Endangered Species Analysis

Federally endangered or threatened species as listed in the U.S. Fish and Wildlife Service , Division of Endangered Species for Indiana include 12 species of mussels, 4 species of birds, 2 species of bat and butterflies and 1 species of snake. Three endangered species of mussels are found in Dekalb County. The proposed modification is not expected to impact these species.

Federally endangered or threatened plants as listed in the U.S. Fish and Wildlife Service, Division of Endangered Species for Indiana list two threatened and one endangered species of plants. The endangered plant is found along the sand dunes in northern Indiana while the two threatened species do not thrive on cultivated or grazing land. The proposed facility is not expected to impact the area.

The state of Indiana's list of endangered, special concern and extirpated nongame species, as listed in the Department of Natural Resources, Division of Fish and Wildlife for Dekalb County, contains two species of birds, one species of amphibians, two species of fish, two species of mammals, 10 species of mollusks and two species of reptiles which may be found in the area of Cooper - Standard. However, the impacts are not expected to have any additional adverse effects on the habitats of the species than what has already occurred from the agricultural activity in the area.

Additional Analysis Conclusions

The nearest Class I area to the tire manufacturing facility is the Mammoth Cave National Park

located approximately 450 km southwest in Kentucky. Operation of the proposed facility will not adversely affect the visibility at this Class I area. Cooper - Standard is located well beyond 100 kilometers (61 miles) from Mammoth Cave National Park and will not have significant impact on the Class I area. The results of the additional impact analysis conclude the Cooper - Standard's proposed facility will have no adverse impact on economic growth, soils, vegetation, endangered or threatened species or visibility on any Class I area.

Table 1 - RPM-IV Modeling for Cooper - Standard				
NAAQS Analysis for Ozone (June 18, 1994)				
Time	Distance	Ambient	Plume-Injected	Source Impact
(hours)	(meters)	(ppb)	(ppb)	(ppb)
700.0	100.0	28.0	28.0	0
800.0	7120.0	53.3	55.8	2.5
900.0	13100.0	74.1	76.5	2.4
1000.0	19700.0	91.2	93.4	2.2
1100.0	26700.0	105	106	1
1200.0	32600.0	113	114	1
1300.0	40300.0	118	117	-1
1400.0	51700.0	120	118	-2
1500.0	63600.0	121	118	-3
1600.0	81200.0	121	118	-3
1700.0	101000.0	121	118	-3
1800.0	116000.0	121	118	-3
1900.0	127000.0	121	118	-3