



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 1, 2004

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

TO: Interested Parties / Applicant

RE: American Roller / 141-16048-00067

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**American Roller Company, LLC
201 Industrial Drive
Walkerton, Indiana 46574**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, renovation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the application requirements set forth in Section B, Emergency Provisions.

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

Operation Permit No.: T141-16048-00067	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 1, 2004 Expiration Date: July 1, 2009



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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a industrial roller refurbishing operation.

Responsible Official:	Vice President of Finance
Source Address:	201 Industrial Drive, Walkerton, Indiana 46574
Mailing Address:	201 Industrial Drive, Walkerton, Indiana 46574
General Source Phone Number:	(262) 878-2445
SIC Code:	3069
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD 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 consists of the following emission units and pollution control devices:

- (a) One (1) urethane mold preparation and clean-up operation, identified as P06, with a maximum throughput of 12,000 rollers per year, exhausting to one (1) stack (S06).
- (b) One (1) general solvent clean-up operation, with a maximum throughput of 12,000 rollers per year, identified as F01.
- (c) One (1) grinding/polishing/trimming operation, identified as P11, with a maximum throughput of 12,000 rollers per year, using one (1) cyclone as control, exhausting to one (1) stack (S11).

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

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (3.4 million British thermal units per hour (MMBTU/hr) natural gas-fired boiler, S1, constructed in August 1992). [326 IAC 6-1-2(b)]
- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2(a)]
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2(a)]
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (e) Activities with emissions equal to or less than the following requirements: 5 tons per year PM or PM10, 10 tons per year SO₂, Nox, 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 (Core preparation -removal of old core covering by stripping and belt sanding). [326 IAC 6-1-2(a)]

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:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL 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 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

B.3 Enforceability [326 IAC 2-7-7]

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

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the PMPs, including any required record keeping, 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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, and Northern Regional Office 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 (Toll Free) or 1-574-245-4870 (Local)
Northern Regional Office Fax Number: 1-574-245-4877
 - (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.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 3-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification 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)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2 7 5(3)] [326 IAC 2 7 6] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2(c)]
- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- C.6 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 is in operation.
- C.7 Stack Height [326 IAC 1-7]
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.14 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. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. 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 time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (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 Operation, Maintenance and Monitoring (OMM) Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for 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, in accordance with Section D, 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being

implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-7-1(34).

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

Part 2 MACT Application Submittal Requirement

C.20 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 Maximum Achievable Control Technology (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)]

- (a) One (1) urethane mold preparation and clean-up operation, identified as P06, with a maximum throughput of 12,000 rollers per year, exhausting to one (1) stack (S06);
- (b) One (1) general solvent clean-up operation, with a maximum throughput of 12,000 rollers per year, identified as F01.

Insignificant Activities:

- (c) One (1) solvent testing of rollers operation, identified as P12, with a maximum throughput of 12,000 rollers per year, exhausting to stack S12.

(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)]

There are no additional specifically applicable requirements for this equipment.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) One (1) grinding/polishing/trimming operation, identified as P11, using one (1) cyclone as control, exhausting to one (1) stack (S11).

Insignificant Activities:

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (3.4 million British thermal units per hour (MMBtu/hr) natural gas-fired boiler, S1, constructed in August 1992). [326 IAC 6-1-2(b)]
- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2(a)]
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2(a)]
- (e) Activities with emissions equal to or less than the following requirements: 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 (Core preparation -removal of old core covering by stripping and belt sanding). [326 IAC 6-1-2(a)]

(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.2.1 Particulate Matter Limitation (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the grinding/polishing/trimming, the brazing, cutting, soldering and welding equipment, the trimmers, and the core preparation operation shall be limited to 0.03 grains per dry standard cubic foot.

D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-1-2(b)]

Pursuant to 326 IAC 6-1-2(b)(3)(Nonattainment Area Limitations), the particulate matter emissions from the 3.4 MMBtu per hour boiler shall be limited to 0.01 grains per dry standard cubic foot.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Control

Pursuant to 40 CFR 64 (CAM) and in order to comply with Condition D.2.1, the cyclone for particulate control shall be in operation and control emissions from the grinding/polishing/trimming at all times when the grinding/polishing/trimming is in operation.

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

D.2.5 Visible Emissions Notations

Pursuant to 40 CFR 64 (CAM), the Permittee shall comply with the following requirements:

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

D.2.6 Cyclone Inspections

Pursuant to 40 CFR 64 (CAM), an inspection shall be performed each calendar quarter of all cyclones controlling the grinding/trimming/polishing operation. Inspections required by this condition shall not be performed in consecutive months.

D.2.7 Cyclone Failure Detection

Pursuant to 40 CFR 64 (CAM), in the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

- (a) Pursuant to 40 CFR 64 (CAM), to document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the grinding/polishing/trimming operation stack exhaust once per shift.
- (b) Pursuant to 40 CFR 64 (CAM), to document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: American Roller Company, LLC
Source Address: 201 Industrial Drive, Walkerton, Indiana 46574
Mailing Address: 201 Industrial Drive, Walkerton, Indiana 46574
Part 70 Permit No.: T141-16048-0067

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: American Roller Company, LLC
Source Address: 201 Industrial Drive, Walkerton, Indiana 46574
Mailing Address: 201 Industrial Drive, Walkerton, Indiana 46574
Part 70 Permit No.: T141-16048-0067

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a Part 70 Operating Permit

Source Background and Description

Source Name:	American Roller Company, LLC
Source Location:	201 Industrial Drive, Walkerton, Indiana 46574
County:	St. Joseph
SIC Code:	3069
Operation Permit No.:	T141-7883-00067
Operation Permit Issuance Date:	October 6, 1998
Permit Renewal Number:	141-16048-00067
Permit Reviewer:	ERG/TDP

On April 16, 2004, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that American Roller Company, LLC had applied for a Part 70 Operating Permit to operate an industrial roller refurbishing operation. 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). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The name of the Governor was changed from Frank O'Bannon to Joseph E. Kernan on the first page of the permit.
2. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from Condition B.7.

B.7 Duty to Supplement and Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)]
~~[326 IAC 2-7-6(6)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

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

~~_____ The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(b)(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that

IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

~~(c)~~ **(b)** For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

3. Condition B.10 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to D Section. Because the general record keeping requirements (ie retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so a new (d) has been added to this condition.

B.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

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

(b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation **an exceedance** 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~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "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:

- (d) **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

4. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, an explanation (instructions) and (d) has been added to Condition B.17 Permit Amendment or Modification.

B.17 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.

...

- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

5. For clarity, additional rule cites have been added to Condition B.21 Inspection and Entry.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~Inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

6. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

7. The following change has been made to Condition C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

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

- (a) Pursuant to 40 CFR 52 Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

8. Condition C.8 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

...

- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- ~~(f)~~(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.**

9. Condition C.13 Risk Management Plan has been revised so that it is more straightforward.

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68:215]

If a regulated substance, ~~subject to as defined in 40 CFR 68,~~ is present at a source in more than a

threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

10. Some sources are required to have an Operation, Maintenance and Monitoring (OMM) Plan or Start-up, Shutdown, and Malfunction (SSM) Plan. Instead of having an additional plan, it has been determined that having an OMM can satisfy the requirements for having a CRP. If a source is required to have an SSM Plan, a Parametric Monitoring Plan would also be required to satisfy the requirements to have a CRP. Additional language has been added for these options. Failure to take reasonable response steps shall be considered deviation of the permit; therefore, (b)(4) was revised. Language was added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken.

C.14 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. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** 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 **or Operation, Maintenance and Monitoring (OMM) Plan** and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (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 Operation, Maintenance and Monitoring (OMM) Plan**; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) 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~~ **be considered** a deviation from the permit.
- (c) ...
- (e) The Permittee shall record all instances when, **in accordance with Section D**, 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.
- ...
11. In order to clarify which documents need to be certified by the responsible official, the following update has been made:
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]
-
- (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.
- ...
- The **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
12. Condition C.16 (a) Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.
- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-8-4(3)]
-
- (a) **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8), covering the previous calendar year. The emission statement shall meet the following requirements:**
- (1) **Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);**

- (2) **Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.**

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
(~~and local agency when applicable~~)

The emission statement does require the certification by the "authorized individual" as defined by **326 IAC 2-7-1(34)** ~~326 IAC 2-1.1-1(1)~~.

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, (~~and local agency when applicable~~) on or before the date it is due.
13. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- (a) Records of all required **monitoring** data, reports and support information **required by this Permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
14. The quarterly inspections do not need to be conducted in the last month of the quarter, but they should not occur in consecutive months.

D.2.6 Cyclone Inspections

Pursuant to 40 CFR 64 (CAM), an inspection shall be performed ~~within the last month~~ of each calendar quarter of all cyclones controlling the grinding/trimming/polishing operation. **Inspections required by this condition shall not be performed in consecutive months.**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	American Roller Company, LLC
Source Location:	201 Industrial Drive, Walkerton, Indiana 46574
County:	St. Joseph
SIC Code:	3069
Operation Permit No.:	T141-7883-00067
Operation Permit Issuance Date:	October 6, 1998
Permit Renewal Number:	141-16048-00067
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application renewal from American Roller Company, LLC relating to the operation of an industrial roller refurbishing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) urethane mold preparation and clean-up operation, identified as P06, with a maximum throughput of 12,000 rollers per year, exhausting to one (1) stack (S06).
- (b) One (1) general solvent clean-up operation, with a maximum throughput of 12,000 rollers per year, identified as F01.
- (c) One (1) grinding/polishing/trimming operation, identified as P11, using one (1) cyclone as control, with a maximum throughput of 12,000 rollers per year, exhausting to one (1) stack (S11).

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new emission units or control equipment proposed for this source.

Insignificant Activities

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

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:

- (1) One (1) 3.4 million British thermal units per hour (MMBtu/hr) natural gas-fired boiler, identified as S1, constructed in August 1992 [326 IAC 6-1-2(b)];
 - (2) Four (4) curing ovens with a total natural gas capacity of 1.0 million British thermal units per hour (MMBtu/hr), identified as S7, S8, S9, and S10, for rollers resurfaced via the urethane process constructed in March 1980;
 - (3) One natural-gas fired warm-up oven for resin preparation, with a total natural gas capacity of 1.0 MMBtu/hr, constructed in December 2001.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
 - (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (d) The following equipment related to the manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2(a)];
 - (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
 - (f) Process vessel degassing and cleaning to prepare for internal repairs;
 - (g) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-1-2(a)];
 - (h) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
 - (i) A blowdown separator, identified as S2;
 - (j) Mold release agents using low volatile produces (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C);
 - (k) Activities with emissions equal to or less than the following requirements: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
 - (1) Core preparation - removal of old core covering by stripping and belt sanding [326 IAC 6-1-2(a)];
 - (2) Urethane mixing kettles;
 - (3) Urethane curing ovens;
 - (4) Rubber roller build up and vulcanization process;
 - (5) One solvent testing of rollers operation, identified as P12, exhausting to stack S12.
 - (6) Two steam heated vulcanizing ovens for rollers refurbished via the rubber sheet process. One vulcanizer is 6ft. diameter by 26 ft. long, the other vulcanizer is 6 ft. diameter by 32 ft. long.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Construction Permit (CP 141-3378), issued on May 12, 1994.
- (b) Part 70 Operating Permit (OP 141-7883-00067), issued on October 6, 1998.
- (c) First Reopening 141-13468-00067, issued on November 1, 2001.
- (d) First Administrative Amendment 141-15381-00067, issued on February 18, 2002.
- (e) Second Administrative Amendment 141-15308-00067, issued on March 8, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) **Condition D.1.1:** Volatile Organic Compounds: Any change or modification to each facility that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Reason not incorporated: Condition D.1.1 requires the prior approval of the Office of Air Quality for any modification that would lead to emissions greater than twenty-five (25) tons per year. The condition cites 326 IAC 8 as the reason for this soft limit. There are no 326 IAC 8 rules that would apply if the emissions were greater than twenty-five (25) tons per year. The only purpose this serves is also covered by Condition B.21 (Source Modification Requirement).

- (b) **Condition D.2.1:** Particulate Matter: Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) grinding/polishing/trimming operation shall be limited to 12.26 lbs per hour.

Reason not incorporated: Condition D.2.1 establishes emission limitations for particulate emissions from process operations located anywhere in the state. 326 IAC 6-1 (Nonattainment Area Limitations) establishes limitations for sources or facilities located in St. Joseph county that have actual emissions of ten (10) tons or more of particulate matter per year. Since this source is located in St. Joseph County and has actual emissions of PM greater than ten tons per year, 326 IAC 6-1 applies instead of 326 IAC 6-3. Pursuant to this rule, particulate matter emissions from the one grinding/polishing/trimming operation shall not exceed three-hundredth (0.03) grain per dry standard cubic foot (dscf) as specified in 326 IAC 6-1-2(a)

- (c) **Condition D.3.1:** Particulate Matter: Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 3.4 MMBtu per hour heat input boiler shall be limited to 0.6 lbs per million Btu.

Reason not incorporated: Condition D.3.1 establishes emission limitations for particulate emissions from the combustion of fuel for indirect heating from facilities which were existing and in operation or received permits to construct prior to September 21, 1983. 326 IAC 6-1 (Nonattainment Area Limitations) establishes limitations for sources or facilities located in St. Joseph county that have actual emissions of ten (10) tons or more of particulate matter per year. Since this source is located in St. Joseph County and has actual emissions of PM greater than ten tons per year, 326 IAC 6-1 applies instead of 326

IAC 6-3. Pursuant to this rule, particulate matter emissions from the one 3.4 MMBtu per hour boiler (S1) shall be limited to 0.01 grains per dry standard cubic foot (dscf) of natural gas as specified in 326 IAC 6-1-2(b).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on August 30, 2002, which is before the January 6, 2003 deadline for submittal of a timely renewal application. Additional information was received on January 27, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations, pages 1 through 10.

Potential to Emit of the Source

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.”

The tables below summarize the unrestricted potential to emit of the significant emission units.

Pollutant	Potential To Emit (tons/year)
PM	141
PM-10	141
SO ₂	0.02
VOC	29.6
CO	3.02
NO _x	3.59

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

HAP's	Potential To Emit (tons/year)
Trichloroethylene	2.81
Perchloroethylene	1.41
Methyl isobutyl ketone	1.92
Methyl ethyl ketone	0.30
Xylene	0.15
Hexane	0.06
Methanol	0.04
Ethylbenzene	0.03
Trichloroethane	0.02

HAP's	Potential To Emit (tons/year)
Toluene	0.02
Formaldehyde	0.01
TOTAL	less than 10

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

The source was issued a Part 70 Operating Permit on October 6, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM*	PM-10*	SO ₂	VOC	CO	NO _x	HAPs
One grinding/polishing/trimming operation (P 11)	14.6	14.6	--	--	--	--	--
Other sources	0.07	0.07	0.02	29.6	3.02	3.59	Less than 10
Total Emissions	14.7	14.7	0.02	29.6	3.02	3.59	Less than 10

-- indicates negligible emissions.

*Limited emissions based on requirements of 326 IAC 6-1-1 (Nonattainment Area Limitations).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	14.0
SO ₂	0.0
VOC	7.0
CO	0.0
NO _x	1.0

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	Attainment

SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
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. St. Joseph County has been designated as maintenance attainment 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) St. Joseph County has been classified as attainment for all other 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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The one (1) 3.4 million British thermal units per hour (MMBtu/hr) natural gas fired boiler (Insignificant Activity) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the heat input capacity is less than ten (10) Million British thermal units per hour (MMBtu/hr), even though it was constructed in August 1992.
- (c) The petroleum fuel dispensing facility (Insignificant Activity), is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because the storage capacity is less than 75 cubic meters.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.
- (e) The National Emission Standard for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart Mmmm) does not apply to this source because the potential to emit a single HAP is less than 10 tpy and the potential to emit any combination of HAPs is less than 25 tpy.

- (f) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant 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 the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

The grinding, polishing, and finishing operation, identified as P-11, has the potential to emit, before controls, of greater than one hundred (100) tons per year of particulate. Additionally, 326 IAC 6-1-1 (Nonattainment Area Limitations) provides a particulate emission limitation for this operation. The cyclone, identified as S-11, is used to comply with these limits. Therefore, CAM applies to the grinding, polishing, and finishing operations. Since the post-control emissions from these units are less than one hundred percent of the amount necessary to be classified as a major source, these units are considered "other pollutant-specific emission units" as described in 40 CFR 64.51(b).

Since these operations are considered "other pollutants-specific emission units" a CAM plan was required to be submitted along with the renewal application.

The source submitted a CAM plan on January 27, 2004. The CAM plan suggested that the following be considered CAM: daily visible emission notations and quarterly cyclone inspections. IDEM agrees that daily visible emission notations and inspections are considered CAM and those requirements have been included in the permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was a new source when it was built in 1979. It is not one of the 28 source categories. There have been no modifications since the source was built. The potential emissions for any criteria pollutant are less than two hundred fifty (250) tons per year, therefore, it is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-4.1 (New Source Toxics Control)

The one (1) urethane mold preparation and clean up operations (P06), the one (1) solvent clean-up operation (F01), and the one (1) solvent testing of rollers operation (P12) are not subject to the requirements of 326 IAC 2-4.1 (New Source Toxics Control) because it was constructed in 1979, which is prior to the July 27, 1997 applicability date.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The one (1) urethane mold preparation and clean-up operation (P06), the one (1) solvent clean-up operation (F01), and the one (1) solvent testing of rollers operation (P12) are not subject to 326 IAC 8-6-1 (Organic Solvent Emission Limitations), because the volatile organic compound (VOC) emissions are less than one hundred (100) tons per year. There are no other 326 IAC 8 rules that apply.

State Rule Applicability - Urethane mold, solvent cleanup, and solvent testing operations

326 IAC 8-1-6 (General Reduction Requirements)

The one (1) urethane mold preparation and clean-up operation (P06), the one (1) solvent clean-up operation (F01), and the one (1) solvent testing of rollers operation are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were all constructed in 1979, which is prior to the January 1, 1980 applicability date.

State Rule Applicability - One grinding/polishing/trimming operation (P11)

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

The grinding/polishing/trimming operation (P11) is subject to the requirements of 326 IAC 6-1-1 (Nonattainment Area Limitations) because the source is located in St. Joseph county and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to this rule, particulate matter emissions shall not exceed seven-hundredth (0.07) gram per dry standard cubic meter (g/dscm) or three-hundredth (0.03) grain per dry standard cubic foot (dscf) as specified in 326 IAC 6-1-2(a)

326 IAC 6-1-18 (St. Joseph County Nonattainment Area Limitations)

The grinding/polishing/trimming operation (P11) is not subject to the limitations required by 326 IAC 6-1-18 (St. Joseph County Nonattainment Area Limitations) because it is not one of the listed sources.

State Rule Applicability - Insignificant Activities

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

The 3.4 MMBtu per hour boiler (S1), the brazing, cutting, soldering, and welding equipment, the trimmers, and the core preparation operations are subject to the requirements of 326 IAC 6-1-1 (Nonattainment Area Limitations) because the source is located in St. Joseph county and has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to this rule, particulate matter emissions from the 3.4 MMBtu per hour boiler shall be limited to 0.01 grains per dry standard cubic foot as specified in 326 IAC 6-1-2(b). The particulate matter emissions from the brazing, cutting, soldering and welding equipment, the trimmers, and the core preparation operations shall be limited to 0.03 grains per dry standard cubic foot.

326 IAC 6-1-18 (St. Joseph County Nonattainment Area Limitations)

The 3.4 MMBtu per hour boiler (S1) is not subject to the limitations required by 326 IAC 6-1-18 (St. Joseph County Nonattainment Area Limitations) because it is not one of the listed sources.

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.

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

1. The grinding/polishing/trimming operation has applicable compliance monitoring conditions as specified below:

Visible emission notations of the grinding/polishing/trimming operations shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

2. An inspection shall be performed within the last month of each calendar quarter of all cyclones controlling the grinding/trimming/polishing operation. In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because the cyclone for the grinding/polishing/trimming operation must operate properly to ensure compliance with 40 CFR 64 (CAM) and 326 IAC 6-1 (Nonattainment Area Limitations).

Conclusion

The operation of this industrial roller refurbishing operation shall be subject to the conditions of the attached Part 70 Permit No. T141-16048-00067.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
3.4 MMBtu/hr Boiler**

Company Name: American Roller Company, LLC
Address : 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Pit ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.4

29.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO ₂	NOx	VOC	CO
Potential to Emit in tons/yr	7.6	7.6	0.6	100.0	5.5	84.0
	0.11	0.11	0.01	1.49	0.08	1.25

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF.

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/yr) = 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)

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 3.4 MMBtu/hr Boiler
 HAPs Emissions**

Company Name: American Roller Company, LLC
Address City IN Zip: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Pit ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

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 to Emit in tons/yr	3.127E-05	1.787E-05	1.117E-03	2.681E-02	5.063E-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 to Emit in tons/yr	7.446E-06	1.638E-05	2.085E-05	5.659E-06	3.127E-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.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
One (1) Roller Warm Up Oven and Four (4) Roller Curing Ovens**

Company Name: American Roller Company, LLC
Address City IN Zip: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Pit ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.8 (5 units total)

42.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO ₂	NOx	VOC	CO
Potential to Emit in tons/yr	7.6	7.6	0.6	100.0	5.5	84.0
	0.16	0.16	0.01	2.10	0.12	1.77

*PM and PM10 emission factors are filterable and condensable PM10 combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF.

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/yr) = 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)

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Roller Warm Up Oven and Four (4) Roller Curing Ovens**

Company Name: American Roller Company, LLC
Address City IN Zip: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Pit ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

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 to Emit in tons/yr	4.415E-05	2.523E-05	1.577E-03	3.784E-02	7.148E-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 to Emit in tons/yr	1.051E-05	2.313E-05	2.943E-05	7.989E-06	4.415E-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.

**Appendix A: Emissions Calculations
Roller Grinding, Finishing, and Polishing**

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Plt ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Unit	Maximum Roller Throughput (roller/yr)	*Maximum Amount of Material Removed per Roller (lbs/per roller)	Maximum Amount Removed by Grinding (%)	Dust Collector Control Efficiency	Potential to Emit PM/PM10 before Control (lbs/yr)	Potential to Emit PM/PM10 before Control (ton/yr)	Potential to Emit PM/PM10 after Control (lbs/yr)	Potential to Emit PM/PM10 after Control (ton/yr)
Grinding, Finishing, and Polishing Operation	12000	24	99%	90%	279180	140	27918	14.0
Total						140		14.0

* This information is provided by the source. Assume PM emissions equal to PM10 emissions.

Methodology

Potential to Emit PM/PM10 before control (lbs/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Grinding (%)

Potential to Emit PM/PM10 before control (ton/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Grinding (%) x 1 ton/2000 lbs

Potential to Emit PM/PM10 after control (lbs/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Grinding (%) x (1-Dust Collector Control Efficiency (%))

Potential to Emit PM/PM10 after control (ton/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Grinding (%) x (1-Dust Collector Control Efficiency (%)) x 1 ton/2000 lbs

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0 lbs

Appendix A: Emissions Calculations
Roller Belt Sanding

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Pit ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Unit	Maximum Roller Throughput (roller/yr)	*Maximum Amount of Material Removed per Roller (lbs/per roller)	Maximum Amount Removed by Belt Sanding (%)	Dust Collector Control Efficiency	Potential to Emit PM/PM10 before Control (lbs/yr)	Potential to Emit PM/PM10 before Control (ton/yr)	Potential to Emit PM/PM10 after Control (lbs/yr)	Potential to Emit PM/PM10 after Control (ton/yr)
Roller Belt Sanding	12000	24	1%	85%	2820	1.41	423	0.21
Total						1.41		0.21

* This information is provided by the source. Assume PM emissions equal to PM10 emissions.

Methodology

Potential to Emit PM/PM10 before control (lbs/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Belt Sanding (%)

Potential to Emit PM/PM10 before control (ton/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Belt Sanding (%) x 1 ton/2000 lbs

Potential to Emit PM/PM10 after control (lbs/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Belt Sanding (%) x Dust Collector Control Efficiency (%)

Potential to Emit PM/PM10 after control (ton/yr) = Max. Roller Throughput (roller/yr) x Max. Amount Material Removed Per Roller (lbs/roller) x Maximum Amount Removed by Belt Sanding (%) x Dust Collector Control Efficiency (%) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and HAP Emissions
From Core Preparation**

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16045
PIT ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Roller Type	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/year)	VOC Content (%)	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MIBK	Weight % Carbon Tetrachloride	Weight % Trichloroethane	Weight % Methanol	Weight % Cresol	Weight % MEK	Potential to Emit (ton/yr)												
																VOC Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Trichloroethane Emissions (ton/yr)	Methanol Emissions (ton/yr)	Cresol Emissions (ton/yr)	MEK Emissions (ton/yr)		
Rubber	Chemlock 205	7.80	0.015000	6000	75%	3.00%	15.00%	0.00%	1.00%	60.00%	0.08%	0.00%	0.00%	0.00%	0.00%	0.26	1.05E-02	5.27E-02	0.00E+00	3.51E-03	2.11E-01	2.91E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Rubber	Chemlock 233	9.20	0.002000	6000	76%	10.00%	35.00%	0.00%	0.00%	0.00%	0.07%	35.00%	0.00%	0.00%	0.00%	0.04	5.52E-03	1.93E-02	0.00E+00	0.00E+00	0.00E+00	4.08E-05	1.93E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Urethane	Chemlock 205	7.80	0.015000	6000	75%	3.00%	15.00%	0.00%	1.00%	60.00%	0.08%	0.00%	0.00%	0.00%	0.26	1.05E-02	5.27E-02	0.00E+00	3.51E-03	2.11E-01	2.81E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Urethane	Chemglaze 9944	8.70	0.011000	6000	77%	0.00%	0.00%	0.00%	0.001%	0.00%	0.00%	0.00%	0.00%	0.00%	0.22	0.00E+00	0.00E+00	0.00E+00	2.87E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Urethane	Thixon 405 Clear	8.09	0.012000	6000	75%	0.00%	0.00%	7.75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.22	0.00E+00	0.00E+00	2.26E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Urethane	Thixon 715-720	6.80	0.005000	6000	65%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	42.00%	1.30%	23.00%	0.07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.28E-02	1.33E-03	2.35E-02	0.00E+00	0.00E+00
Urethane	Thixon 907	7.50	0.011000	6000	100%	0.00%	10.00%	0.00%	0.00%	36.00%	0.00%	0.00%	0.00%	0.00%	0.25	0.00E+00	2.48E-02	0.00E+00	0.00E+00	8.91E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total Potential to Emit (tons/yr)																1.32	0.03	0.15	0.02	0.01	0.51	0.001	0.02	0.04	0.001	0.02		
Total Potential to Emit HAPs (tons/yr)																0.80												

METHODOLOGY

Potential to Emit VOC (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/yr) * % VOC * 1ton/2000lbs
 Potential to Emit HAPS (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/yr) * Weight % HAP * 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions from Urethane Curing

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Plt ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Urethane Mixture Application: 1020000 lbs per year
Weight Loss from Curing*: 0.126 %

Potential to Emit of VOC: 0.64 tons VOC/yr

*The source estimated a maximum % weight loss of VOC equal to 0.126% for curing operation.

Methodology

Potential to Emit of VOC = Urethane Mixture Application x Weight Loss as VOC x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
from Urethane Mold Preparation and Clean-up

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Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Plt ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Mold Preparation and Clean-up Material Use: 2500 gallons Di Basic Ester (DBE) per year
Density of DBE: 9.06 lbs/gallon

Potential to Emit of VOC: 11.3 tons VOC/yr

Methodology

Potential to Emit of VOC = Mold Preparation and Clean-up Material Use (gal DBE/yr) x Density of DBE (lb/gal) x 1 ton/2000 lb

Appendix A: Emission Calculations
VOC and HAP Emissions
from Roller Cleaning and General Clean-up Solvent Use

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Plt ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

Roller Type	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum Throughput (unit/year)	VOC Content (%)	Weight % MIBK	Weight % Trichloro-ethylene	Weight % Perchloro-ethylene	Weight % MEK	Potential to Emit (ton/yr)				
										VOC	MIBK	Trichloro-ethylene	Perchloro-ethylene	MEK
All	Isopropyl Alcohol	6.57	0.087	12000	100%	0.00%	0.00%	0.00%	0.00%	3.43	0.00	0.00	0.00	0.00
All	S-1376 Solvent Blend	10.48	0.149	12000	100%	15.0%	30.0%	15.0%	0.00%	9.37	1.41	2.81	1.41	0.00
All	Isopar C Fluid	5.82	0.087	12000	100%	0.00%	0.00%	0.00%	0.00%	3.04	0.00	0.00	0.00	0.00
All	Other and Misc (as MEK)	6.75	0.007	12000	100%	0.00%	0.00%	0.00%	100%	0.28	0.00	0.00	0.00	0.28

Total Potential to Emit (tons/yr) **16.1** **1.41** **2.81** **1.41** **0.28**
Total Potential to Emit HAPs (tons/yr) **5.90**

METHODOLOGY

Potential to Emit of VOC (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/yr) * % VOC * 1ton/2000lbs

Potential to Emit of HAPs (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/yr) * Weight % HAP * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: American Roller Company, LLC
Address: 201 Industrial Drive, Walkerton, Indiana 46574
Title V Permit: 141-16048
Plt ID: 141-00067
Reviewer: ERG/TDP
Date: February 5, 2004

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO₂	NO_x	VOC	CO
3.4 MMBtu/hr Boiler	0.11	0.11	0.01	1.49	0.08	1.25
Warm Up Oven & Curing Ovens	0.16	0.16	0.01	2.10	0.12	1.77
Roller Grinding, Finishing, Polishing	140	140				
Roller Belt Sanding	1.41	1.41				
Core Preparation					1.32	
Urethane Curing					0.64	
Urethane Mold Preparation and Clean-up					11.3	
Roller Cleaning and General Clean-up Solvent Use					16.1	
TOTAL	141	141	0.02	3.59	29.6	3.02