INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

June 23, 2004

TO: Interested Parties / Applicant

RE: Griffith Rubber Mills / 033-17355-00080

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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.

Enclosures
FNPER.dot 9/16/03

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www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

Griffith Rubber Mills
400 North Taylor Road
Garrett, Indiana 46738

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F033-17355-00080	
Issued by: Original Signed by Janet G. McCabe for Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 23, 2004 Expiration Date: June 23, 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, A.3 and 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 2-8-3(b)]

The Permittee owns and operates a stationary custom molded rubber products manufacturing plant.

Authorized Individual:	Maintenance Manager
Source Address:	400 North Taylor Road, Garrett, Indiana 46738
Mailing Address:	400 North Taylor Road, Garrett, Indiana 46738
General Source Phone:	(260) 357-3130
SIC Code:	3061
County:	DeKalb
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This custom molded rubber products manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 400 North Taylor Road, Garrett, Indiana.

(b) Plant 2 is located at 507 North Lee Street, Garrett, Indiana.

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

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

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

Plant 1

(a) One (1) Rubber Molding operations (consisting of seventeen (17) injection molding presses, thirty-two (32) compression molding presses, and fourteen (14) compression/injection blow molding presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.

(b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. Only one gun is utilized at a time and some of the adhesive products are applied via dipping.

(c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour, one of the main rubber compounds processed at this location. These units were constructed in 2004.

Plant 2

(d) Three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

(e) One (1) Rubber Vulcanizing process, utilizing three (3) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.

(f) One (1) Rubber Mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.

(g) One (1) solvent cleaning operation for cleaning small rubber parts by dipping in toluene followed by hand wiping to clean off the solvent residue, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

(h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

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

(1) One (1) Continental boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 4.548 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.

(2) One (1) York Shipley boiler (located at Plant 1), burning natural gas, with a maximum heat input capacity of 3.348 MMBtu per hour and exhausting at stack B1. This unit was installed in 1983.

(3) One (1) Columbia boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 6.238 MMBtu per hour and exhausting at stack B3. This unit was installed in 1959.

(b) Degreasing operations (cold cleaner degreaser) that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This unit was constructed in 1981.

(c) One (1) open top degreaser, with a maximum throughput rate of 0.11 gallon of water-based solvent per hour used to degrease metal inserts. This unit was installed in 2003.

(d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(f) Combustion source flame safety purging on startup.

(g) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding, buffing equipment, and cutting lines.

(l) Closed loop heating and cooling systems.

(m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(n) Natural draft cooling towers not regulated under a NESHAP.

(o) Forced and induced draft cooling tower system not regulated under a NESHAP.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.

(r) 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.

(s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(u) Filter or coalescer media changeout.

(v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^0 Celsius).

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

(1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.

(2) Post cure electric oven, located at Plant 1.

(x) Five (5) Hydraulic presses, located at Plant 2.

(y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.

(z) Small dribble grinding, located in Plant 1.

(aa) Small autoclave with a roof exhaust, located in Plant 1.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

A.6 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) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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

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

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

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certification 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 July 1 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

(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 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(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 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office, 220 W. Colfax Avenue, Ste. 200, South Bend, Indiana, 46601-1634, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Northern Regional Office
Telephone No.: 1-800-753-5519
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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 independently of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ , 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 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ 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 needed to process the application.

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

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

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

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

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

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

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

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

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC13-30-3-1] [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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable).

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

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

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) 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 thirty (30) 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 thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [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 in 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, 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 an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.17 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(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, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Plant 1

(a) One (1) Rubber Molding operations (consisting of seventeen (17) injection molding presses, thirty-two (32) compression molding presses, and fourteen (14) compression/injection blow molding presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.

(b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. Only one gun is utilized at a time and some of the adhesive products are applied via dipping.

(c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour, one of the main rubber compounds processed at this location. These units were constructed in 2004.

Plant 2

(d) Three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

(e) One (1) Rubber Vulcanizing process, utilizing three (3) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.

(f) One (1) Rubber Mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.

(g) One (1) solvent cleaning operation for cleaning small rubber parts by dipping in toluene followed by hand wiping to clean off the solvent residue, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

(h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

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

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

D.1.1 Hazardous Air Pollutants [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the potential to emit from the entire source of any single HAP and any combination of HAPs shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined by the end of each month by using the following equations:

(a) $E_{\text{combined HAP}} = \left[\sum_{n=1}^{12} 3 \ (E1 + E2 + E3 + E4 + E5 + E6 + E7) \right] <$ 25 tons per twelve (12) consecutive month period

(b) $E_{\text{individual HAP}} = \left[\sum_{n=1}^{12} 3 \ (E1 + E2 + E3 + E4 + E5 + E6 + E7) \right] <$ 10 tons per twelve (12) consecutive month period

where:

E combined = Actual Emissions of any combination of HAPs
E individual = Actual Emissions of any single HAP
E 1 = Actual Emissions from rubber extrusion
E 2 = Actual Emissions from rubber vulcanizing
E 3 = Actual Emissions from rubber mixing
E 4 = Actual Emissions from rubber molding
E 5 = Actual Emissions from adhesive coating booth
E 6 = Actual Emissions from ink-jet printing operation
E 7 = Actual Emissions from solvent cleaning operation
n = compliance period in months

(c) E1, E2, E3, and E4 will be calculated as follows:

(A) $E1 = (MT * E.F)$

(B) $E2 = [(MT * E.F)_{\text{Autoclave}} + (MT * E.F)_{\text{Hot Air Cure}}]$

(C) $E3 = (MT * E.F)$

(D) $E4 = [(MT * E.F)_{\text{Material 1}} + (MT * E.F)_{\text{Material 2}} + (MT * E.F)_{\text{Material 3}}]$

where:

MT = maximum throughput rate of material used in pounds per hour
E. F = emission factor in pound of HAP per pound of material

(d) The emission factors, shown in the table below, shall be used in equations specified in Condition D.1.1(c).

Emission Unit	Material	*Emission Factor (lb HAP per lb material)
Rubber Extrusion (E1)	EPDM sulfur cure	2.99E-05
Rubber Vulcanizing (E2)	EPDM sulfur cure using Autoclave	6.03E-03
	EPDM sulfur cure using Hot Cure	9.76E-04
Rubber Mixing (E3)	EPDM sulfur cure	5.58E-05

Rubber Molding (E4)	EPDM sulfur cure - Material 1	1.09E-03
	CRW (Polychloroprene W Type) - Material 2	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

(e) E5, E6, and E7 shall be calculated based on the total HAP usage for each compliance period.

Compliance with the above limits renders 326 IAC 2-7 (Part 70 Program) not applicable to the source.

D.1.2 Particulate [326 IAC 6-3-2] [40 CFR, Subpart P]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the rubber mixing facility and five (5) extruders shall not exceed the pounds per hour limit as shown in the table below.

Emission Unit	Process Weight		Particulate Emission Limit (lb/hour)
	(lb/hour)	(ton/hour)	
Rubber Mixing	1350	0.68	3.17
Each of the three (3) Extruders	998.3	0.49	2.57
Each of the two (2) Extruders	1,000	0.50	2.58

The pound per hour limitation was calculated using the following equation:

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

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

(b) Any change or modification that would increase the adhesive usage to equal to or greater than five (5) gallons per day must receive prior approval from IDEM, OAQ.

D.1.3 VOC [326 IAC 8-2-2] [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-2 (Cold cleaner operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation

requirements; and

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning degreaser constructed after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.1.

(1) The type of material and its maximum throughput in pounds per hour used in the rubber manufacturing facilities consisting of rubber vulcanizing, rubber molding, rubber extrusion, and rubber mixing.

(2) The amount of material and solvent less water used on a monthly basis in the adhesive coating line, printing operation, and splicing operation.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The HAP usage for each compliance period in the adhesive coating line, printing operation, and splicing operation

(4) Records of all calculations required by Condition D.1.1.

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

D.1.5 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10]: Insignificant Activities

(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) Continental boiler (located in Plant 2), burning natural gas, with a maximum heat input capacity of 4.548 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.

(2) One (1) York Shipley boiler (located in Plant 1), burning natural gas, with a maximum heat input capacity of 3.348 MMBtu per hour and exhausting at stack B1. This unit was installed in 1983.

(3) One (1) Columbia boiler (located in Plant 2), burning natural gas, with a maximum heat input capacity of 6.238 MMBtu per hour and exhausting at stack B3. This unit was installed in 1959.

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

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

D.2.1 Particulate [326 IAC 6-2-3]

(a) Pursuant to 326 IAC 6-2-3 (d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input. Therefore, the Columbia boiler shall not exceed 0.8 lbs of particulate per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from all facilities used for indirect heating purposes which were existing and in operation after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the York Shipley boiler shall not exceed 0.6 lbs of particulate per MMBtu heat input.

D.2.2 Particulate [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 4.548 MMBtu per hour heat input boiler shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu (lb per MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This unit was constructed in 1981.

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

Emission Limitations and Standards

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

(k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding, buffing equipment, and cutting lines.

(y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.

(z) Small dribble grinding, located in Plant 1.

(aa) Small autoclave with a roof exhaust, located in Plant 1.

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

Emission Limitations and Standards

D.4.1 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate 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 per hour.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

(c) One (1) open top degreaser, with a maximum throughput rate of 0.11 gallon of water-based solvent per hour used to degrease metal inserts. This unit was installed in 2003.

(d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(f) Combustion source flame safety purging on startup.

(g) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(l) Closed loop heating and cooling systems.

(m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(n) Natural draft cooling towers not regulated under a NESHAP.

(o) Forced and induced draft cooling tower system not regulated under a NESHAP.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.

(r) 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.

(s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(u) Filter or coalescer media changeout.

(v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^0 Celsius).

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

(1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.

(2) Post cure electric oven, located at Plant 1.

(x) Five (5) Hydraulic presses, located at Plant 2.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

This form consists of 2 pages **Page 1 of 2**

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

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing, Rubber Mixing, Rubber Molding, Rubber Extrusion Adhesive Coating Booth, Solvent Cleaning Operation, Ink-jet Printing Operation
Parameter: A single HAP
Limit: Less than ten(10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing, Rubber Mixing, Rubber Molding, Rubber Extrusion Adhesive Coating Booth, Solvent Cleaning Operation, Ink-jet Printing Operation
Parameter: Combined HAPs
Limit: Less than twenty-five(25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

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

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Griffith Rubber Mills
Source Location:	400 North Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	033-17355-00080
Permit Reviewer:	ERG/SD

On April 30, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that Griffith Rubber Mills had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary custom molded rubber products manufacturing plant. The notice also stated that IDEM, 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.

On May 11, 2004, Griffith Rubber Mills submitted comments on the proposed FESOP. The summary of the comments and responses are shown below. Deleted text will be shown as strikeout and new text will be shown as bold. The Table of Contents has been updated as necessary.

Comment 1:

The source requested the following revisions to the facility description under Section A.3.

1. Item (b): To specify that only one (1) spray gun can be utilized in the adhesive coating booth at any single time and that same of the adhesive products are applied by dipping.

2. Item (c): To identify the EPDM Sulfur Cure is one of the main rubber compounds processed in the two (2) extruding lines (identified as extruder 4 and 5).

3. Item (f): To clarify that the rubber mixing operation is equipped with a baghouse that exhausts inside the building.

4. Item (g): To clarify that the solvent cleaning operation consists of cleaning small rubber parts by dipping in toluene and hand wiping to clean off the solvent residue.

Response to Comment 1:

The facility descriptions under Section A.3 have been corrected. For clarification purposes, Section D.1 has also been corrected so that it agrees with the description shown below.

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

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

Plant 1

. . . .

(b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. **Only one gun is utilized at a time and some of the adhesive products are applied via dipping.**

(c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour**, one of the main rubber compounds processed at this location**. These units were constructed in 2004.

Plant 2

. . . .

(f) One (1) Rubber Mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location**,** ~~and~~ controlled by one (1) baghouse **and exhausting inside the building**. This unit was constructed in 2001.

(g) One (1) solvent cleaning operation for cleaning small rubber parts **by dipping in toluene followed by hand wiping to clean off the solvent residue**, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

(h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Plant 1

. . . . .

(b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. **Only one gun is utilized at a time and some of the adhesive products are applied via dipping.**

(c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour**, one of the main rubber compounds processed at this location**. These units were constructed in 2004.

Plant 2

. . . .

(f) One (1) Rubber Mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location**,** ~~and~~ controlled by one (1) baghouse **and exhausting inside the building**. This unit was constructed in 2001.

(g) One (1) solvent cleaning operation for cleaning small rubber parts **by dipping in toluene followed by hand wiping to clean off the solvent residue**, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

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

Comment 2:

The source requested the addition of insignificant activities under Section A.4, which are as follows:

1. Rubber part deflashing using liquid nitrogen, located in Plant 1.

2. Small dribble grinding, located in Plant 1.

3. Small autoclave with a roof exhaust, located in Plant 1.

4. Cutting lines in Plant 2.

5. Buffing operations in both plants.

The source also requested that the description of the post cure electric oven (listed as item (w)(2) in Condition A.4 specify that this oven is located in Plant 1. Similarly, the source requested that the description of the five hydraulic presses (listed as item (x) in Condition A.4) specify that these emission units are located in Plant 2.

Response to Comment 2:

Section A.4 was amended to include the above insignificant activities. For clarification purposes, Section D.4 and D.5 have been corrected so that they agree with the description shown below.

Furthermore, the rubber part deflashing using liquid nitrogen unit, small dribble grinding unit, and small autoclave are subject to the provisions of 40 CFR 52, Subpart P, which states that the particulate 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. Therefore, the rubber part deflashing using liquid nitrogen unit, small dribble grinding unit, and small autoclave shall not exceed 0.551 pounder of particulate per hour.

The potential to emit of PM/PM10 from the entire source is equal to 2.53 tons per year. The addition of these insignificant activities does not change the current permit status of the source.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

. . . .

(k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding**, buffing** equipment**, and cutting lines**.

. . . . .

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

(1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.

(2) Post cure electric oven**, located at Plant 1**.

(x) Five (5) Hydraulic presses**, located at Plant 2**.

(y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.

(z) Small dribble grinding, located in Plant 1.

(aa) Small autoclave with a roof exhaust, located in Plant1.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

(k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding**, buffing** equipment**, and cutting lines**.

(y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.

(z) Small dribble grinding, located in Plant 1.

(aa) Small autoclave with a roof exhaust, located in Plant 1.

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

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

. . . .

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

(1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.

(2) Post cure electric oven**, located at Plant 1**.

(x) Five (5) Hydraulic presses**, located at Plant 2**.

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

Comment 3:

The source requested Condition D.1.3 be deleted because the solvent cleaning operation located in Plant 2 is not subject to the provisions of 326 IAC 8-3-2(Colder cleaner operation) and 326 IAC 8-3-5(Cold cleaner operation and control). The cleaning operation involves dipping the ends of the extruded rubber parts into small containers of Toluene to help clean the stock, to enhance the bond as the splicing operation takes place, and to help lubricate the rubber as it is inserted into the mold.

Response to Comment 3:

The solvent cleaning operation was constructed in 2001 and uses an organic solvent (Toluene) to perform organic solvent degreasing operations. Therefore, this unit is subject to 326 IAC 8-3-2(Colder cleaner operation) and 326 IAC 8-3-5(Cold cleaner operation and control). No change has been made to the permit.

Comment 4:

The source requested the quarterly reports included in the FESOP be amended to include the rubber extrusion facility because the HAP emissions from this unit must be counted towards

HAP emission limits of 10 tons per year and 25 tons per year.

Response to Comment 4:

IDEM, OAQ has corrected the quarterly report forms to include the rubber extrusion facility as shown below. For clarification purposes, the terms degreaser and splicing area were changed to solvent cleaning operation and ink jet-printing operation, respectively to correctly reflect the facility description under A.3.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing, Rubber Mix**i**ng, Rubber Molding, **Rubber Extrusion** Adhesive Coating **Booth, Solvent Cleaning Operation, Ink-jet Printing Operation**~~, Degreasing, Splicing Area~~
Parameter: A single HAP
Limit: Less than ten(10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing, Rubber Mix**i**ng, Rubber Molding, **Rubber Extrusion** Adhesive Coating **Booth, Solvent Cleaning Operation, Ink-jet Printing Operation** ~~Degreasing, Splicing Area~~
Parameter: Combined HAPs
Limit: Less than twenty-five(25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

1. The sentence in Condition D.4.1 has been corrected from "....shall not exceed o.551 per hour to shall not exceed 0.551 pound per hour. Also, reference to the welding operation in the sentence was deleted. The change in the permit is shown below:

D.4.1 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, ~~including the welding operation~~, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed ~~o~~**0**.551 **pounds** per hour.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Griffith Rubber Mills
Source Location:	400 North Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	033-17355-00080
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a FESOP application from Griffith Rubber Mills, relating to the operation of a stationary custom molded rubber products manufacturing plant.

Source Definition

This custom molded rubber products manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 400 North Taylor Road, Garrett, Indiana 46738

(b) Plant 2 is located at 507 North Lee Street, Garrett, Indiana 46738

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of two (2) plants which have the following unpermitted emission units and pollution control devices:

Plant 1

(a) One (1) Rubber Molding operations (consisting of seventeen (17) injection molding presses, thirty-two (32) compression molding presses, and fourteen (14) compression/injection blow molding presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.

(b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996.

(c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour. These units were constructed in 2004.

Plant 2

(d) Three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

(e) One (1) Rubber Vulcanizing process, utilizing three (3) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.

(f) One (1) Rubber Mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location and controlled by one (1) baghouse. This unit was constructed in 2001.

(g) One (1) solvent cleaning operation for cleaning small rubber parts, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

(h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

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) Continental boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 4.548 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.

(2) One (1) York Shipley boiler (located at Plant 1), burning natural gas, with a maximum heat input capacity of 3.348 MMBtu per hour and exhausting at stack B1. This unit was installed in 1983.

(3) One (1) Columbia boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 6.238 MMBtu per hour and exhausting at stack B3. This unit was installed in 1959.

(b) Degreasing operations (cold cleaner degreaser) that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This unit was constructed in 1981.

(c) One (1) open top degreaser, with a maximum throughput rate of 0.11 gallon of water-based solvent per hour used to degrease metal inserts. This unit was installed in 2003.

(d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(f) Combustion source flame safety purging on startup.

(g) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment.

(l) Closed loop heating and cooling systems.

(m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(n) Natural draft cooling towers not regulated under a NESHAP.

(o) Forced and induced draft cooling tower system not regulated under a NESHAP.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.

(r) 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.

(s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(u) Filter or coalescer media changeout.

(v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^0 Celsius).

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

(1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.

(2) Post cure electric oven

(x) Five (5) Hydraulic presses.

Existing Approvals

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

Registration No. 17-03-81-0056, issued on May 7, 1981.

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.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on March 17, 2003 and August 11, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 14).

Potential To Emit for 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.”

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

Pollutant	Potential To Emit (tons/year)
PM	2.53
PM10	2.53
SO_2	0.06
VOC	37.3
CO	7.99
NO_x	9.51

*Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Ethylene-Propylene-Diene Mixture	100.8
Xylene	3.36
MIBK	0.75
Ethylbenzene	0.23
MEK	3.34
Toluene	5.34
Total HAPs	114

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

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

	Potential to Emit (tons/year)						
Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Natural gas fired boilers	0.47	0.47	0.04	6.19	0.34	5.20	Negligible
Natural gas fired combustion units (space heaters, comfort units, and furnaces)	0.25	0.25	0.02	3.32	0.18	2.79	Negligible
Rubber molding	0.0	0.0	0.0	0.0	2.20	0.0	The source shall be limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combination of HAPs from the entire source.
Rubber extruders	5.80E-04	5.80E-04	0.0	0.0	0.08	0.0	
Rubber vulcanizing	0.0	0.0	0.0	0.0	11.7	0.0	
Rubber mixing	1.31	1.31	0.0	0.0	0.09	0.0	
Adhesive coating booth	0.49	0.49	0.0	0.0	6.94	0.0	
Ink-jet Printing	0.0	0.0	0.0	0.0	1.25	0.0	
Degreasing	0.0	0.0	0.0	0.0	0.05	0.0	
Solvent cleaning	0.0	0.0	0.0	0.0	14.4	0.0	

	Potential to Emit (tons/year)						
Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Total Source Emissions	2.53	2.53	0.06	9.51	37.3	7.97	The source shall be limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combination of HAPs from the entire source.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) DeKalb 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.

Federal Rule Applicability

(a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring are not applicable because this source has accepted limitations on its potential to emit and agreed to operate under a Federally Enforceable State Operating Permit.

(b) The York Shipley and Columbia boiler are not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because they were constructed prior to the applicability date of June 9, 1989 and have maximum heat input capacities less than 10 MMBtu per hour.

(c) The York Shipley boiler (constructed in 1983) and the Continental boiler (constructed in 1999) are not subject to the requirements of 40 CFR 60, Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced after September 18, 1978 (326 IAC 12) because they have a maximum heat input capacity less than 250 MMBtu per hour. The Columbia boiler was constructed

prior to the applicability date and has a heat input capacity less than 250 MMBtu per hour.

(d) The Continental boiler (constructed in 1999) is not subject to the requirements of 40 CFR 60, Subpart Db - Standards of Performance for Industrial -Commercial-Institutional Steam Generating Units (326 IAC 12) because it has a maximum heat input capacity less than 100 MMBtu per hour. The York Shipley and Columbia boiler were constructed prior to the applicability date and the have heat input capacities less than 100 MMBtu per hour.

(e) Although constructed after June 9, 1989, the Continental boiler is not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because the maximum heat input capacity of the boiler is less than 10 MMBtu per hour.

(f) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing (326 IAC 12), because this NSPS applies only to rotogravure printing presses. Griffith Rubber Mills does not use any rotogravure printing presses at this plant.

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

(g) All degreasing faciltiies and solvent cleaning operations are not subject to the requirements of 40 CFR Part 63, Subpart T - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (326 IAC 14), because these facilities use only toluene (C_7H_8) to clean parts, which is a nonhalogenated solvent.

(h) This source is not subject to the requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs): Rubber Tire Manufacturing (326 IAC 14), because this source does not manufacture tires. It manufactures custom molded rubber products used for trucks, cars, air conditioners, farming equipment, school buses, etc.

(i) This source is not subject to the requirements of 40 CFR 63, Subpart Q - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial Process Cooling Towers because the source does not operate a cooling tower with chromium-based water chemicals.

(j) This source is not subject to the requirements of 40 CFR 63, Subpart KK - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry (326 IAC 14), because this source does not operate a rotogravure or wide-web flexographic printing presses. It operates injection molding presses, compression molding presses, and compression/injection blow molding presses, and hydraulic presses for manufacturing custom molded rubber products.

(k) This source is not subject to the requirements of 40 CFR 63, Subpart OOOO -National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Printing, Coating and Dyeing of Fabrics and Other Textiles (326 IAC 14), because this source does not print, coat or dye any fabrics or textiles. It manufactures custom molded rubber products

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

(l) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because although the source has potential to emit of any single HAP above ten (10) tons per year and any combination of HAPs above twenty-five (25) tons per year, the source has agreed to operate under a Federally Enforceable State Operating Permit (FESOP) which limits their HAP emissions to below the major source threshold levels.

State Rule Applicability - Entire Source

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

Griffith Rubber Mills was constructed prior to August 7, 1977 and is not in one (1) of the twenty-eight (28) source categories. At the time the source was constructed, it was a minor source under PSD because the potential to emit of each criteria pollutant before controls was less than the PSD major source threshold of 250 tons per year. The source was modified in 1983 to install one (1) York Shipley boiler at plant 1. In 1996 the rubber molding operations and the adhesive coating booth were relocated from plant 2 to plant 1, and one (1) rubber extruder line 3 was constructed at plant 2. The source was modified in 1998 to install a ink-jet printing line; in 1999 to install one (1) Continental boiler; in 2001 to construct one (1) rubber vulcanizing process, one (1) rubber mixing operation, one (1) solvent cleaning operation, and two (2) extruder lines 1 and 2; in 2003 to install one (1) degreaser; and in 2004 to install two (2) extruder lines 4 and 5. None of these modifications triggered PSD review and the potential to emit of each criteria pollutants remained below 250 tons per year PSD threshold. Therefore, the source is an existing minor source under PSD and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in DeKalb County and the potential to emit of all criteria pollutants after the issuance of this FESOP is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAPs))

All major sources of HAPs were constructed prior to July 27,1997 applicability date for this rule, except for one (1) rubber vulcanizing process, utilizing three (3) autoclaves and one (1) hot air oven cure (part of the microwave line), which was constructed in 2001 and has a potential to emit of single and combination of HAPs greater than ten (10) and twenty-five (25) tons per year, respectively. However, the actual emissions from the entire source have never exceeded the 10 and 25 tons per year threshold and the Permittee has requested to operate the source under the provisions of a Federally Enforceable State Operating Permit (FESOP) that limits the potential HAP emissions to less than 10 and 25 tons per year for a single and combination of HAPs, respectively. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this source.

326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

The potential to emit of a single HAP and any combination of HAPs from the entire source are greater than ten (10) and twenty-five (25) tons per year, respectively. Since the HAP emissions from the rubber manufacturing facilities vary depending on the amount and type of material

being used, a single numerical throughput limit cannot be used. The following equations and emission factors have been included in the draft permit to limit the HAP emissions to less than 10 tons per year of single HAP and less than 25 tons per year of combined HAP:

(a) $E_{\text{combined HAP}} = [\sum_{n=1}^{12} (E1 + E2 + E3 + E4 + E5 + E6 + E7)_n]$ < 25 tons per twelve (12) consecutive month period.

(b) $E_{\text{individual HAP}} = [\sum_{n=1}^{12} (E1 + E2 + E3 + E4 + E5 + E6 + E7)_n]$ < 10 tons per twelve (12) consecutive month period.

where:

$E_{\text{combined HAP}}$ = Actual emissions of any combination of HAPs
$E_{\text{individual HAP}}$ = Actual emissions of any single HAP
E 1 = Actual emissions from rubber extrusion
E 2 = Actual emissions from rubber vulcanizing
E 3 = Actual emissions from rubber mixing
E 4 = Actual emissions from rubber molding
E 5 = Actual emissions from adhesive coating booth
E 6 = Actual emissions from ink-jet printing operation
E 7 = Actual emissions from solvent cleaning operation
n = compliance period in months

(c) E1, E2, E3, and E4 will be calculated as follows:

(A) $E1 = (MT * E.F)$

(B) $E2 = [(MT * E.F)_{\text{Autoclave}} + (MT * E.F)_{\text{Hot Air Cure}}]$

(C) $E3 = (MT * E.F)$

(D) $E4 = [(MT * E.F)_{\text{Material 1}} + (MT * E.F)_{\text{Material 2}} + (MT * E.F)_{\text{Material 3}}]$

where:

MT = maximum throughput rate of material used in pounds per hour
E. F = emission factor in pound of HAP per pound of material

(d) The emission factors shown in the table below, shall be used in equations specified in paragraph (c).

Emission Unit	Material	Emission Factor* (lb HAP per lb material)
Rubber Extrusion (E1)	EPDM Sulfur Cure	2.99E-05
Rubber Vulcanizing (E2)	EPDM Sulfur Cure using Autoclave	6.03E-03
	EPDM Sulfur Cure using Hot Air Oven Cure	9.76E-04
Rubber Mixing (E3)	EPDM Sulfur Cure	5.58E-05
	EPDM Sulfur Cure - Material 1	1.09E-03
Rubber Molding (E4)		

Emission Unit	Material	Emission Factor* (lb HAP per lb material)
	CRW (Polychloroprene W Type) - Material 2	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

(e) E5, E6, and E7 shall be calculated based on the total HAP usage for each compliance period.

These limits ensure that emissions from the entire source will be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for any combination of HAPs. These limits render 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

State Rule Applicability - Rubber Molding, Rubber Vulcanizing, Rubber Mixing, Extruders

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the rubber mixing facility and the five (5) rubber extruders shall not exceed the pounds per hour limit as shown in the table below:

Emission Unit	Process Weight (tons/hour)	Process Weight (lb/hour)	Particulate Emission Limit (lb/hour)
Rubber Mixing	0.68	1,350	3.17
Each of the three (3) Extruders	0.49	998.3	2.57
Each of the two (2) Extruders	0.50	1,000	2.58

The pounds per hour limitation was calculated using the following equation:

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

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

Based on potential to emit calculations (shown in Appendix A , page 8 of 14), the particulate emissions from the rubber mixing operation is 0.30 pounds per hour, uncontrolled. Therefore, the source will be in compliance with this rule.

The particulate emissions from the five (5) extruder lines are negligible (See Appendix A, page 6 of 14). Therefore, the source is in compliance with this rule.

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

Although constructed after January 1, 1980, the operation of rubber molding operations, rubber vulcanizing process, rubber mixing operation and the five (5) rubber extruder lines, results in potential emissions of VOC less than twenty-five (25) tons per year. Therefore, they are not subject to the requirements of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements).

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

This source is not subject to the requirements of 326 IAC 8-5-4 (Pneumatic Rubber Manufacturing Operation) because this source does not manufacture pneumatic tires or passenger type tires. It manufactures custom molded rubber products used for trucks, cars, air conditioners, farming equipment, and school buses.

State Rule Applicability - Adhesive Coating Booth

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date is permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR Subpart P, the particulate emissions from the adhesive coating booth shall be limited by the following:

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

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

However under the rule revision, the adhesive coating booth is exempt from the requirements of 326 IAC 6-3-2 because it uses less than five (5) gallons of adhesive per day [326 IAC 6-3-1(b)(15)]. Any change or modification that would increase the adhesive usage equal to or greater than five (5) gallons per day must receive prior approval from IDEM, OAQ.

326 IAC 8-1-6 (New Facilities : General Reduction Requirement)

Although constructed after January 1, 1980 applicability date for this rule, the adhesive coating booth is not subject to the requirements of 326 IAC 8-1-6 (New Facilities : General Reduction Requirement) because the potential VOC emissions from this line are less than twenty-five (25) tons per year.

State Rule Applicability - Natural Gas-Fired Boilers

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(a), the PM emissions from the 6.238 MMBtu per hour natural gas fired Columbia boiler (identified as B3) and from the 3.348 MMBtu per hour natural gas fired York Shipley boiler (identified as B1), which were existing and in operation before September 21, 1983, are calculated as follows:

$$Pt = \frac{(C * a * h)}{(76.5 * Q^{0.75} * N^{0.25})}$$

For Columbia boiler (identified as B3):

$$Pt = \frac{50 * 0.67 * 25}{76.5 * (6.238)^{0.75} * (1)^{0.25}}$$

Pt = 2.77 lb per MMBtu

For York Shipley boiler (identified as B1):

$$Pt = \frac{50 * 0.67 * 25}{76.5 * (9.60)^{0.75} * (2)^{0.25}}$$

Pt = 1.69 lb per MMBtu

where: Pt = emission rate limit (lbs per MMBtu)
C = 50 ug/m^3
a = plume rise factor (0.67)
Q = total source heat input capacity rating in MMBtu per hour (9.60 MMBtu per hour)
N = number of stacks
h = stack height (ft)

However, 326 IAC 6-2-3(d) states that boilers constructed before June 8, 1972 shall in no case exceed 0.8 pounds of particulate matter per MMBtu heat input and 326 IAC 6-2-3(e) states that boilers constructed after June 8, 1972 shall in no case exceed 0.6 pounds of particulate matter per MMBtu heat input. Since 0.8 and 0.6 pounds of particulate matter per MMBtu heat input are less than the limits calculated using the above equation, the Columbia and York Shipley boilers shall be limited to 0.8 pounds and 0.6 pounds of particulate per MMBtu heat input, respectively.

326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the natural gas fired Continental boiler (identified as B2), which was constructed after September 21, 1983 shall be limited to 0.55 pounds of particulate matter per MMBtu heat input as follows:

This limit is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

$$Pt = \frac{1.09}{(14.1)^{0.26}}$$

Pt = 0.55

where: Pt =emission rate limit (lb per MMBtu)
Q = total source heat input capacity rating in MMBtu per hour (14.1 MMBtu per hour)

State Rule Applicability - Solvent Cleaning Operation

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The one (1) solvent cleaning operation is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) and 326 IAC 8-3-5 (Cold cleaner degreaser operation and control) because this unit uses an organic solvent and was constructed in 2001.

(a) Pursuant to 326 IAC 8-3-2 (Cold cleaner operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements; and

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning degreaser constructed after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability - Ink-Jet Printing

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

Although constructed after January 1, 1980, the operation of the ink jet printing facility, results in potential emissions of VOC less than twenty-five (25) tons per year. Therefore, it is not subject to the requirements of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements).

State Rule Applicability - Insignificant Activities (Other Than Boilers)

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, including the welding operation, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Therefore, the welding operation and the cutting torches shall each not exceed 0.551 pounds per hour. The above limit shall be valid until revisions to rule 326 IAC 6-3-1 (Particulate Emissions Limitation for Manufacturing Processes) are approved by the EPA into the SIP.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

(a) Although constructed after January 1, 1980 the one (1) open top degreaser is not subject to the requirements of 326 IAC 8-3-3(Open top vapor degreaser operation) and 326 IAC 8-3-6 (Open top vapor degreaser operation and control) because this unit uses a non-organic solvent degreasing agent

(b) The degreasing operation (cold cleaner operation) is subject to the requirements of 326 IAC 8-3-2(Cold Cleaner Operations) because this unit was constructed in 1981.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere

There are no specifically applicable regulations that apply to other emission units described under insignificant activities.

Testing Requirements

No testing is required for the rubber vulcanizing, rubber molding, rubber extrusion, and rubber mixing operations because the actual emissions of HAPs from these units is based on rubber manufacturing emission factors developed by Rubber Manufacturing Association (RMA) using EPDM HAP emission factor, which represents the worst-case scenario.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period. The compliance monitoring requirements applicable to this source are as follows:

There are no applicable compliance monitoring applicable to this source:

Conclusion

The operation of this custom molded rubber products manufacturing plant shall be subject to the conditions of the attached FESOP No. F033-17355-00080.

Appendix A: Emission Calculations
Three (3) Natural Gas Fired Boilers (identified as B1, B2 and B3)

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
14.1	(3 units total)	124

Pollutant

	PM*	PM10*	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.47	0.47	0.04	6.19	0.34	5.20

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See page 2 for HAPs emissions calculations.

Appendix A: Emission Calculations
Three (3) Natural Gas Fired Boilers (identified as B1, B2 and B3)

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.30E-04	7.43E-05	4.64E-03	1.11E-01	2.10E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	3.10E-05	6.81E-05	8.67E-05	2.35E-05	1.30E-04

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Furnaces, Space Heaters, and Comfort Units

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
7.57	(16 units total)	66.3

Pollutant

	PM*	PM10*	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.25	0.25	0.02	3.32	0.18	2.79

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See page 4 for HAPs emissions calculations.

Appendix A: Emission Calculations
Furnaces and Space Heaters

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	6.97E-05	3.98E-05	2.49E-03	5.97E-02	1.13E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.66E-05	3.65E-05	4.64E-05	1.26E-05	6.97E-05

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and HAP Emissions
From Rubber Molding Operation

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 1

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant/lb rubber)	PTE of VOC (lb/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant/lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)
Small Autoclave (using EPDM Sulfur Cure	600	4.49E-04	2.69E-01	1.18	1.09E-03	6.54E-01	2.86
EPDM Sulfur Cure	769	4.49E-04	3.45E-01	1.51	1.09E-03	8.38E-01	3.67
CRW	174	2.40E-04	4.18E-02	0.18	6.68E-04	1.16E-01	0.51
CRG	174	6.66E-04	1.16E-01	0.51	1.36E-03	2.37E-01	1.04
SBR 1502/SBR 1500	144	NA			NA		
TOTAL	1261			**2.20**			**8.08**

* Emission factors for VOC and HAPs are from Rubber Manufacturers Association (RMA), Table 4.12-8 - Platen Press Curing (1994).

** Materials : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure)
CRW (Polychloroprene W Type)
CRG (Polychloroprene G Type)
Oil-Extended Styrene-Butadiene (SBR 1502)
Emulsion Styrene-Butadiene (SBR 1500)

There are no PM/PM10 emissions from the press curing operation.

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)
Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC, HAP and PM/PM10 Emissions
From Rubber Manufacturing Operation Consisting of Five (5) Extruder Lines

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 1 and Plant 2

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant/lb rubber)	PTE of VOC (lbs/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant/lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)	* Emission Factor for PM/PM10 (lb pollutant/lb rubber)	PTE of PM/PM10 (lb/hour)	PTE of PM/PM10 (ton/year)
EPDM Sulfur Cure	2995	3.52E-06	0.01	0.05	2.99E-05	8.96E-02	0.39	2.67E-08	8.0E-05	3.50E-04
EPDM Sulfur Cure	2000	3.52E-06	0.01	0.03	2.99E-05	5.98E-02	0.26	2.67E-08	5.3E-05	2.34E-04
TOTAL				**0.08**			**0.65**			**5.84E-04**

* Emission factors for VOC, HAP and PM/PM10 are from Rubber Manufacturers Association (RMA), Table4.12-6 - Extruder (1994).
** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure)

METHODOLOGY
Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)
Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and HAP Emissions
From Rubber Vulcanizing Operation Consisting of 3 Autoclaves, and 1 Hot Air Cure

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 2

** Material	Unit	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant / lb rubber)	PTE of VOC (lb/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant / lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)
EPDM Sulfur Cure	3 Autoclaves	2995	6.65E-05	0.20	0.87	6.03E-03	18.1	79.1
	1 Hot Air Cure	2995	8.25E-04	2.47	10.8	9.76E-04	2.92	12.8
TOTAL					**11.7**			**91.9**

* Emission factors for VOC and HAP are from Rubber Manufacturers Association (RMA), Table 4.12-9 - Autoclave Curing and Table 4.12-10 - Hot Air Cure (1994).
** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure)

METHODOLOGY
Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)
Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC, HAP and PM/PM10 Emissions
From Rubber Mixing Operations

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 2

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant / lb rubber)	PTE of VOC (lb/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant / lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)	* Emission Factor for PM/PM10 (lb pollutant / lb rubber)	PTE of PM/PM10 (lb/hour)	PTE of PM/PM10 (ton/year)
EPDM Sulfur Cure	1350	1.47E-05	0.02	0.09	5.58E-05	0.08	0.33	2.22E-04	0.30	1.31
TOTAL				**0.09**			**0.33**			**1.31**

* Emission factors for VOC, HAP and PM/PM10 are from Rubber Manufacturers Association (RMA), Table 4.12-4 - Internal Mixing & Milling (1994).
** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure)

METHODOLOGY
Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)
Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and PM/PM10
From Adhesive Coating Line

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 1

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Throughput (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hour)	PTE VOC (lb/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency	PTE PM/PM10 (lb/hour)
Chemlok 205	7.68	81.0%	0.0%	81.0%	0.0%	10.7%	0.05	6.22	6.22	0.31	7.47	1.36	0.19	40%	0.04
Chemlok 205	7.74	85.9%	0.0%	85.9%	0.0%	6.92%	0.05	6.65	6.65	0.33	7.98	1.46	0.14	40%	0.03
Chemlok 205	7.56	88.6%	0.0%	88.6%	0.0%	6.76%	0.07	6.70	6.70	0.47	11.2	2.05	0.16	40%	0.04
MEK	6.75	100%	0.0%	100%	0.0%	0.0%	0.07	6.75	6.75	0.47	11.3	2.07	0.00	40%	0.00
TOTAL												**6.94**	**0.49**		

* Material is applied using three (3) air atomization guns. One (1) gun can be used at a given time. Some adhesives products are applied by dipping. For worst case scenario, assume all of the material is sprayed.

METHODOLOGY

Pounds of VOC per gallon coating less Water = Density (lb/gal) * Weight % Organics * 1/ (1-Volume % Water)
Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics
PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour)
PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Max.Throughput (gal/hour) * 24 hour/day
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year *1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %)

Appendix A: Emissions Calculations
HAP Emissions
From Adhesive Coating Line

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 1

Material	Density (lb/gal)	*Max. Usage Rate (gal/hour)	Weight % Xylene	Weight % MIBK	Weight % Trichloroethylene	Weight % Ethylbenzene	Weight % MEK	PTE Xylene (ton/year)	PTE MIBK (ton/year)	PTE Trichloroethylene (tons/year)	PTE Ethylbenzene (tons/year)	PTE MEK (tons/year)
Chemlok 205	7.68	0.05	32.1%	44.470%	10.7%	2.2%	1.48%	0.54	0.75	0.18	0.04	0.02
Chemlok 205	7.74	0.05	55.1%	0.0%	18.0%	1.4%	0.00	0.93	0.00	0.31	0.02	0.00
Chemlok 205	7.56	0.07	81.3%	0.0%	0.0%	7.2%	0.00	1.88	0.00	0.00	0.17	0.00
MEK	6.75	0.07	0.0%	0.0%	0.0%	0.0%	100%	0.00	0.00	0.00	0.00	2.07
TOTAL								**3.36**	**0.75**	**0.48**	**0.23**	**2.09**

Single Highest HAP (Xylene) = 3.36
Combination of HAPs = 6.91

METHODOLODY
Potential To Emit HAPs (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and HAP Emissions
From Ink-Jet Printing Operation

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

Plant 2

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % MEK	PTE of VOC/MEK (lbs/hour)	PTE of VOC/MEK (tons/year)
Solvent Based Ink	7.08	0.012	100%	0.09	0.37
Pure MEK	6.67	0.030	100%	0.20	0.88
TOTAL					**1.25**

Note: The source utilizes a continuous ink-jet printing unit to add solvent based ink to the rubber strips proccessed on the mircrowave line.
Pure MEK is used as a clean-up solvent

METHODOLOGY
Potential to Emit (lbs/hour) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP
Potential to Emit (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760hours/year * 1 ton/2000 lb

Appendix A: Emission Calculations
VOC and HAP Emissions
From Degreaser Operations

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

Plant 2

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % VOC	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)
ArmaKleen	9.85	0.11	1.00%	0.01	0.05
TOTAL					**0.05**

Note: This small open top vapor degreaer uses a water based solvent and cleans the metal inserts prior to adhesive coating operation

METHODOLOGY
Potential to Emit (lbs/hour) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % VOC
Potential to Emit (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % VOC * 8760hours/year * 1 ton/2000 lb

Appendix A: Emission Calculations
VOC and HAP Emissions
From Solvent Cleaning Operation

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

PLANT 2

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Toluene	PTE of VOC/Toluene (lbs/hour)	PTE of VOC/Toluene (tons/year)
Toluene	7.25	0.168	100%	1.22	5.34
Safety Kleen	6.67	0.31	100%	2.08	9.11
TOTAL SUM					**14.4**

Note: The source utilizes a solvent cleaning operation where the small rubber parts are dipped in Toluene and then hand wiped to clean the solvent residue. After the parts are cleaned, they are prepared for loading in the five small hydraulic presses.

METHODOLOGY
Potential to Emit (lbs/hour) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP
Potential to Emit (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760hours/year * 1 ton/2000 lb

Appendix A: Emission Calculations
Emission Summary

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP: 033-17355
Plt ID: 033-00080
Reviewer: ERG/SD
Date: December 8, 2003 (Updated by ERG/SD on April 12th, 2004)

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAPs	Contruction Dates
Natural Gas Fired Boilers	0.47	0.47	0.04	6.19	0.34	5.20	Negligible	1959, 1983, 1999
Natural Gas Fired Combustion Units	0.25	0.25	0.02	3.32	0.18	2.79	Negligible	
Rubber Molding					2.20		8.08	1996
Rubber Extruders	5.8E-04	5.8E-04			0.08		0.65	1996 and 2001
Rubber Vulcanizing					11.7		91.9	2001
Rubber Mixing	1.31	1.31			0.09		0.33	2001
Adhesive Coating Booth	0.49	0.49			6.94		6.91	1996
Ink-Jet Printing					1.25		1.25	1998
Degreasing					0.05			2003
Solvent Cleaning					14.4		5.34	2001
	2.53	2.53	0.06	9.51	37.3	7.99	114	