



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 18, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

RE: Cooper-Standard Automotive, Inc. / 033-18530-00013

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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June 18, 2004

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

Re: 033-18530-00013
First Significant Permit Modification to
Part 70 No.: T033-6253-00013

Dear Mr. Hertsel:

Cooper - Standard Automotive, Inc., was issued a Part 70 operating permit T033-6253-00013 on February 13, 2004 for a mixed rubber and molded rubber operation. A letter requested changes to this permit was received on July 26, 2002. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of the following units:

New Coating Operations (GR-05)

- (p) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (q) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (r) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (s) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) dip tanks; and

- (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

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

ERG/MP

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

(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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T033-6253-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 13, 2004 Expiration Date: February 13, 2009
First Significant Permit Modification No.: T033-18530-00013	Affected Pages: 11, 50-54, 71
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 18, 2004 Expiration Date: June 18, 2009

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SECTION A SOURCE SUMMARY

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

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

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

Responsible Official:	Plant Manager
Source Address:	207 South West Street, Auburn, Indiana 46706
Mailing Address:	207 South West Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 925-0700
SIC Code:	3061
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

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

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

Boilers

- (a) One (1) natural gas-fired boiler, identified as unit 500, installed in 1968, rated at 30 MMBtu/hr, and exhausting to stack 11;
- (b) One (1) natural gas-fired and distillate No. 2 fuel oil-fired boiler, identified as unit 501, installed in 1992, rated at 33.475 MMBtu/hr and exhausting to stack 100;

Storage Tanks

- (c) Seven (7) fixed roof cone volatile organic liquid storage tanks:
 - (1) One (1) fuel oil storage tank, identified as unit 503, installed in 1970, with an annual throughput of 1,164,000 gal/yr, and a maximum capacity of 10,000 gallons;
 - (2) One (1) fuel oil storage tank, identified as unit 507, installed in 1969, with an annual throughput of 360,000 gal/yr, and a maximum capacity of 6,000 gallons;
 - (3) One (1) process oil storage tank, identified as unit 508, installed in 1969, and with a maximum capacity of 6,000 gallons;
 - (4) One (1) process oil storage tank, identified as unit 504, installed in 1993, with an annual throughput of 312,800 gal/yr, and a maximum capacity of 20,000 gallons;
 - (5) One (1) process oil storage tank, identified as unit 505, installed in 1993, with an annual throughput of 360,000 gal/yr, and a maximum capacity of 20,000 gallons;

- (6) One (1) process oil storage tank, identified as unit 506, installed in 1993, with an annual throughput of 1,800,000 gal/yr, and a maximum capacity of 20,000 gallons; and
- (7) One (1) process oil storage tank, identified as unit 509, installed in 1988, with an annual throughput of 312,800 gal/yr, and a maximum capacity of 10,000 gallon;

Rubber Mixing Systems

- (d) Two (2) rubber mixing systems:
 - (1) One (1) rubber mixing system No.2, installed in 1993, with a production rate of 16,500 pounds per hour, comprised of:
 - (A) Three (3) carbon black surge bins, identified as units 107, 108, and 109, with emissions controlled by bin vent filters and filter room A, and exhausting to stack 118;
 - (B) Four (4) carbon black totes, identified as units 110, 111, 112, and 113;
 - (C) Four (4) carbon black tote surge hoppers, identified as 114, 115, 116, and 117, with emissions controlled by a dust collector (DC-1) and filter room A, exhausting to stack 118;
 - (D) One (1) carbon black weigh hopper, identified as unit 118 with emissions controlled by a dust collector (DC-1) and filter room A, and exhausting to stack 118;
 - (E) One (1) carbon black chute vent, identified as unit 119, with emissions controlled by a dust collector (DC-1) and filter room A, exhausting to stack 118;
 - (F) Four (4) filler totes, identified as units 120, 121, 122, and 123;
 - (G) Four (4) filler tote surge hoppers, identified as units 124, 125, 126, and 127, with emissions controlled by a dust collector (DC-4) and filter room A, exhausting to stack 118;
 - (H) One (1) filler weigh hopper, identified as unit 128 with emissions controlled by a dust collector (DC-4) and filter room A, exhausting to stack 118;
 - (I) One (1) filler chute vent, identified as unit 129, with emissions controlled by a dust collector (DC-4) and filter room A exhausting to stack 118;
 - (J) One (1) Banbury mixer, identified as unit 130, with emissions controlled by two dust collectors (DC-1 and DC-2) and filter room A, exhausting to stack 118;
 - (K) One (1) drop mill, identified as unit 131, with emissions controlled by a dust collector (DC-2) and filter room A, exhausting to stack 118;
 - (L) One (1) dip unit and cooler, identified as units 132 and 133, respectively, with emissions controlled by filter room B, exhausting to stack 119;

- (M) One (1) carbon black bulk unloading, handling, and storage system, identified as unit 102, including three (3) carbon black storage silos, identified as units 103, 104, and 105 with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;
- (N) One (1) unloading area vacuum system, identified as unit 134, with emissions controlled by a dust collector (DC-6) and filter room A, exhausting to stack 118;
- (O) One (1) mixing area vacuum system, identified as unit 135, with emissions controlled by a dust collector (DC-5) and filter room A, exhausting to stack 118; and
- (P) One (1) compounding station for Mixer No. 2, identified as unit 100, with emissions controlled by DC-3 and filter room A, exhausting to stack 118;
- (2) One (1) rubber mixing system No. 3, installed in 1996, with a production rate of 21,200 pounds per hour, comprised of:
 - (A) Three (3) carbon black surge bins, identified as units 207, 208, and 209, with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;
 - (B) Five (5) carbon black totes, identified as units 210, 211, 212, 213, and 214;
 - (C) Five (5) carbon black tote surge hoppers, identified as units 215, 216, 217, 218, and 219, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (D) One (1) carbon black weigh hopper, identified as unit 220, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (E) One (1) carbon black chute vent, identified as unit 221, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (F) Four (4) filler totes, identified as units 222, 223, 224, and 225 and four (4) filler tote surge hoppers, identified as units 226, 227, 228, and 229, with emissions controlled by a dust collector (DC-7) and filter room A, exhausting to stack 118;
 - (G) One (1) filler weigh hopper, identified as unit 230, with emissions controlled with a dust collector (DC-7) and filter room A, exhausting to stack 118;
 - (H) One (1) filler chute vent, identified as 231, with emissions controlled by a dust collector (DC-7) and filter room A exhausting to stack 118;
 - (I) One (1) banbury mixer, identified as unit 232, with emissions controlled by dust collectors DC-8 and DC-9 and filter room A, exhausting to stack 118;
 - (J) One (1) drop mill, identified as unit 233, with emissions controlled by a dust collector (DC-8) and filter room A, exhausting to stack 118;

- (K) One (1) dip unit and one (1) cooler, identified as units 234, and 235, respectively, with emissions controlled by filter room B, exhausting to stack 119;
- (L) One (1) supersac unloading system, identified as unit 101, installed in 1995, with emissions controlled by a dust collector (DC-10), and exhausting inside the building;
- (M) One (1) compounding station for mixer No. 3, identified as unit 200, installed in 1996, with emissions controlled by a dust collector (DC-7), and filter room A, exhausting to stack 118 also consists of compounding Trolley, with emissions controlled by dust collector (DC-11), exhausting into the room; and
- (N) One (1) carbon black storage silo, identified as unit 106, with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;

Processing Operations

- (e) Four (4) breakdown mills, identified as units 006, 007, 008, and 009, constructed in 1992, 1994, 1989, and 1989, respectively, each with a maximum throughput of 42,000,000 lb/yr, exhausting inside the building;
- (f) One (1) extruder, identified as unit 010, with a maximum throughput of 13,423,882 lb/yr, exhausting inside the building;
- (g) One (1) rubber curing operation, identified as unit 400, comprised of forty-seven (47) presses, thirty-three (33) of which were installed between 1960 and 1982, eleven (11) of which were added in 1999, and three (3) of which were added in 2002 (these three are identified as IM-01, IM-02, and IM-03), with a combined maximum throughput of 5,764 pounds of rubber per hour, some with associated finish grinding steps, with emissions controlled by a dust collector that exhaust inside the building;
- (h) Eighteen (18) rubber injection molding presses, identified as unit 400, constructed in 2003, each with a maximum capacity of 116 pounds per hour, and associated insignificant grinding wheels, identified as unit 600, with emissions controlled by dust collectors that exhaust inside the building;
- (i) Two (2) curing operation autoclaves, identified as unit 401, the original installed prior to 1975 and a new autoclave installed in 1999, with a maximum combined throughput of 8,280 pounds molded rubber per hour and exhausting to stack 38 and stack 126, respectively;
- (j) Two (2) mold cleaners, identified as units 402 and 403, each with a maximum capacity of 180 pounds of plastic shot blast per hour, with emissions controlled by dust collectors that exhaust inside the building;
- (k) One (1) natural gas kolene unit, identified as unit 320, installed in 1990, rated at 2 MMBtu/hr, equipped with a venturi scrubber for control of particulate matter and exhausting to stack 42. The natural gas combustion operation of the kolene unit is exhausted from stack 43.
- (l) Wheelabrator metal shot blaster, identified as unit 301, equipped with a dust filter and exhausting inside the building with a maximum capacity of 29,400 pounds of metal shot per hour.
- (m) One (1) wheelabrator, identified as Wheelabrator #2, with a unit ID of 327.

Adhesive/Coating Application Operations and Cleaning Area

- (n) Adhesive/Coating Application Operations:
- (1) One (1) dip style coating line #2, identified as unit 322, installed in 1999, with a maximum capacity of 960 units per hour and one (1) insignificant natural gas-fired oven with a maximum capacity of 0.14 million Btu/hr, exhausting to stacks 128 and 127, respectively;
 - (2) One (1) automated coating line designated Auto Line #2, identified as unit 321, installed in 1999, consisting of two (2) booths, which apply adhesive cements and primer or cover coatings through high volume low pressure (HVLP) spray guns to a maximum of 7,200 metal inserts per hour and exhaust through stacks 121 and 122 with dry filters as particulate matter overspray control. The emission unit includes three (3) associated 0.4 MMBtu/hr indirect heaters, which are insignificant activities;
 - (3) One (1) adhesive/coating mixing room, identified as unit 302, installed in 1990, exhausting to stacks 112 and 113;
 - (4) Six (6) Chain-on-Edge (COE) systems each with dry filters as particulate matter overspray control:
 - (A) COE No. 1, identified as unit 303, installed prior to 1980, and exhausting to stacks 12, 13, 14, and 15;
 - (B) COE No. 2, identified as unit 304, installed in 1981, equipped with an electric oven, and exhausting to stacks 5 and 22;
 - (C) COE No. 3, identified as unit 305, installed in 1986, equipped with an electric oven, and exhausting to stacks 48, 49, and 51;
 - (D) COE No. 4, identified as unit 306, installed in 1988, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 69, 70, and 71;
 - (E) COE No. 5, identified as unit 307, installed in 1988, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 75, 76, and 77; and
 - (F) COE No. 6, identified as unit 308, installed in 1991, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 82, 83, and 84;
 - (5) One (1) ID/OD No.1, with dry filters as particulate matter overspray control, identified as unit 309, installed in 1988, and exhausting to stacks 72, 73, and 74. The emission unit includes a 0.4 MMBtu/hr indirect gas-fired heater which is an insignificant activity;
 - (6) Two (2) Ronci adhesive dip coating lines, identified as units 312 and 313, both installed in 1986, and exhausting to stack 21;
 - (7) One (1) automatic coating line (Auto Line #1) consisting of two (2) adhesive coating booths with overspray controlled by baffles, identified as unit 315, installed prior to 1980, and exhausting to stacks 16, 17, 18, and 19;

- (8) One (1) hand-operated spray booth, with overspray controlled by baffles, identified as unit 316, exhausting to stacks 8 and 9; and
- (9) One (1) channel mount color code operation, identified as unit 317; and
- (o) One spray gun cleaning area, identified as Unit 319, using toluene, xylene, and methyl isobutyl keytone.

New Coating Operations (GR-05)

- (p) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (q) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (r) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, to be installed in 2004, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (s) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) dip tanks; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

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

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

- (a) Asbestos abatement projects regulated by 326 IAC 14-10 [326 IAC 14-10].

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

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

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

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

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

and

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

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

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

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in

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

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

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

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 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 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c), which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326

IAC 1-7-1(3), 1-7-2, 1-7-3(c) and (d), 1-7-4, and 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

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

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

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

- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

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

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement

additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

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

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-32)("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(3)] [40 CFR 63.9(b)]

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

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

and

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Boilers

- (a) One (1) natural gas-fired boiler, identified as unit 500, installed in 1968, rated at 30 MMBtu/hr, and exhausting to stack 11;
- (b) One (1) natural gas-fired and distillate No. 2 fuel oil-fired boiler, identified as unit 501, installed in 1992, rated at 33.475 MMBtu/hr and exhausting to stack 100;

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-2]

- (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)), PM emissions from the 30 MMBtu per hour heat input boiler (unit 500), used for indirect heating purposes, and was existing and in operation on or before June 8, 1972, and in no case shall exceed 0.8 pounds of particulate matter per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 33.475 MMBtu per hour heat input boiler (unit 501) shall be limited to 0.366 pounds per MMBtu heat input by the following equation:

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

where

Pt = emissions rate limit (lb/MMBtu)

Q = total source heat input capacity (66.4 MMBtu/hr)

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1] [326 IAC 12-1] [40 CFR 60.40c]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the 33.475 MMBtu/hr natural gas-fired and oil-fired boiler (unit 501) shall not exceed five tenths (0.5) pounds per million Btu heat input, or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

The fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.3 Opacity [326 IAC 12-1] [40 CFR 60.40c]

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), visible emissions from unit 501 shall be limited to 20 percent opacity (6-minute average) while oil is being combusted, except for one 6-minute period per hour of not more than 27 percent opacity.

D.1.4 PSD Synthetic Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP033-2472-00015, issued on October 6, 1992, consumption of No. 2 fuel oil in unit 501 shall not exceed 1,126.2 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to SO₂ emissions of less than 40 tons per year. This condition renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.6 Natural Gas

In order to demonstrate compliance with Condition D.1.1(a), the 30 MMBtu/hr boiler shall burn only natural gas.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate sulfur dioxide compliance for unit 501 utilizing one of the following methods:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

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

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of stack 100 exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Conditions D.1.2 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) Calendar dates covered in the compliance determination period.
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions.
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternative fuels and not determining compliance pursuant to 326 IAC 8-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier.
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the boiler stack 100 exhaust while combusting fuel oil.
 - (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

- (a) The natural gas boiler certification shall be submitted for Boiler 501 to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A quarterly report of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Storage Tanks

- (c) Seven (7) fixed roof cone volatile organic liquid storage tanks:
- (1) One (1) fuel oil storage tank, identified as unit 503, installed in 1970, with an annual throughput of 1,164,000 gal/yr, and a maximum capacity of 10,000 gallons;
 - (2) One (1) fuel oil storage tank, identified as unit 507, installed in 1969, with an annual throughput of 360,000 gal/yr, and a maximum capacity of 6,000 gallons;
 - (3) One (1) process oil storage tank, identified as unit 508, installed in 1969, and with a maximum capacity of 6,000 gallons;
 - (4) One (1) process oil storage tank, identified as unit 504, installed in 1993, with an annual throughput of 312,800 gal/yr, and a maximum capacity of 20,000 gallons;
 - (5) One (1) process oil storage tank, identified as unit 505, installed in 1993, with an annual throughput of 360,000 gal/yr, and a maximum capacity of 20,000 gallons;
 - (6) One (1) process oil storage tank, identified as unit 506, installed in 1993, with an annual throughput of 1,800,000 gal/yr, and a maximum capacity of 20,000 gallons; and
 - (7) One (1) process oil storage tank, identified as unit 509, installed in 1988, with an annual throughput of 312,800 gal/yr, and a maximum capacity of 10,000 gallon;

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60, Subpart Kb]

Units 504, 505, and 506 are subject to 40 CFR 60, Subpart Kb. These tanks are exempt from the General Provisions (40 CFR Part 60, Subpart A). No provisions of Subpart Kb apply, except for a record keeping requirement.

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

D.2.2 Record Keeping Requirements [326 IAC 12-1] [40 CFR 60, Subpart Kb]

To document compliance with 40 CFR 60, Subpart Kb, records must be maintained of storage tank (units 504, 505, and 506) dimensions and capacity, as prescribed in 40 CFR 60.116b.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Rubber Mixing Systems

- (d) Two (2) rubber mixing systems:
- (1) One (1) rubber mixing system No.2, installed in 1993, with a production rate of 16,500 pounds per hour, comprised of:
 - (A) Three (3) carbon black surge bins, identified as units 107, 108, and 109, with emissions controlled by bin vent filters and filter room A, and exhausting to stack 118;
 - (B) Four (4) carbon black totes, identified as units 110, 111, 112, and 113;
 - (C) Four (4) carbon black tote surge hoppers, identified as 114, 115, 116, and 117, with emissions controlled by a dust collector (DC-1) and filter room A, exhausting to stack 118;
 - (D) One (1) carbon black weigh hopper, identified as unit 118 with emissions controlled by a dust collector (DC-1) and filter room A, and exhausting to stack 118;
 - (E) One (1) carbon black chute vent, identified as unit 119, with emissions controlled by a dust collector (DC-1) and filter room A, exhausting to stack 118;
 - (F) Four (4) filler totes, identified as units 120, 121, 122, and 123;
 - (G) Four (4) filler tote surge hoppers, identified as units 124, 125, 126, and 127, with emissions controlled by a dust collector (DC-4) and filter room A, exhausting to stack 118;
 - (H) One (1) filler weigh hopper, identified as unit 128 with emissions controlled by a dust collector (DC-4) and filter room A, exhausting to stack 118;
 - (I) One (1) filler chute vent, identified as unit 129, with emissions controlled by a dust collector (DC-4) and filter room A exhausting to stack 118;
 - (J) One (1) Banbury mixer, identified as unit 130, with emissions controlled by two dust collectors (DC-1 and DC-2) and filter room A, exhausting to stack 118;
 - (K) One (1) drop mill, identified as unit 131, with emissions controlled by a dust collector (DC-2) and filter room A, exhausting to stack 118;
 - (L) One (1) dip unit and cooler, identified as units 132 and 133, respectively, with emissions controlled by filter room B, exhausting to stack 119;
 - (M) One (1) carbon black bulk unloading, handling, and storage system, identified as unit 102, including three (3) carbon black storage silos, identified as units 103, 104, and 105 with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

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

Rubber Mixing Systems (Continued)

- (N) One (1) unloading area vacuum system, identified as unit 134, with emissions controlled by a dust collector (DC-6) and filter room A, exhausting to stack 118;
- (O) One (1) mixing area vacuum system, identified as unit 135, with emissions controlled by a dust collector (DC-5) and filter room A, exhausting to stack 118; and
- (P) One (1) compounding station for Mixer No. 2, identified as unit 100, with emissions controlled by DC-3 and filter room A, exhausting to stack 118;
- (2) One (1) rubber mixing system No. 3, installed in 1996, with a production rate of 21,200 pounds per hour, comprised of:
 - (A) Three (3) carbon black surge bins, identified as units 207, 208, and 209, with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;
 - (B) Five (5) carbon black totes, identified as units 210, 211, 212, 213, and 214;
 - (C) Five (5) carbon black tote surge hoppers, identified as units 215, 216, 217, 218, and 219, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (D) One (1) carbon black weigh hopper, identified as unit 220, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (E) One (1) carbon black chute vent, identified as unit 221, with emissions controlled by a dust collector (DC-9) and filter room A, exhausting to stack 118;
 - (F) Four (4) filler totes, identified as units 222, 223, 224, and 225 and four (4) filler tote surge hoppers, identified as units 226, 227, 228, and 229, with emissions controlled by a dust collector (DC-7) and filter room A, exhausting to stack 118;
 - (G) One (1) filler weigh hopper, identified as unit 230, with emissions controlled with a dust collector (DC-7) and filter room A, exhausting to stack 118;
 - (H) One (1) filler chute vent, identified as 231, with emissions controlled by a dust collector (DC-7) and filter room A exhausting to stack 118;
 - (I) One (1) banbury mixer, identified as unit 232, with emissions controlled by dust collectors DC-8 and DC-9 and filter room A, exhausting to stack 118;

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

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

Rubber Mixing Systems (Continued)

- (J) One (1) drop mill, identified as unit 233, with emissions controlled by a dust collector (DC-8) and filter room A, exhausting to stack 118;
- (K) One (1) dip unit and one (1) cooler, identified as units 234, and 235, respectively, with emissions controlled by filter room B, exhausting to stack 119;
- (L) One (1) supersac unloading system, identified as unit 101, installed in 1995, with emissions controlled by a dust collector (DC-10), and exhausting inside the building;
- (M) One (1) compounding station for mixer No. 3, identified as unit 200, installed in 1996, with emissions controlled by a dust collector (DC-7), and filter room A, exhausting to stack 118; also consists of compounding Trolley, with emissions controlled by dust collector (DC-11), exhausting into the room; and
- (N) One (1) carbon black storage silo, identified as unit 106, with emissions controlled by bin vent filters and filter room A, exhausting to stack 118;

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to CP033-2898-00013, issued May 20, 1993, the allowable PM emissions rate from filter room A and filter room B shall not exceed 0.00553 gr/acfm and 0.00115 gr/acfm, respectively, and the opacity shall not exceed 10%.
- (b) Pursuant to CP033-4327-00013, issued November 6, 1995, the allowable PM emission rate from rubber mixing system No. 3 shall not exceed 19.94 lb/hr.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

In order to comply with D.3.1, the bin vent filters, dust collectors, and filter rooms for PM control shall be in operation at all times that the facilities listed in the description are in operation.

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

D.3.4 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 118 and 119 shall be performed daily during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

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

D.3.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the filters used in conjunction with Filter Rooms A and B, at least once daily when the rubber mixing systems are in operation. When for any one reading, the pressure drop across the filters are outside the normal range of 0.1 and 2 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.3.6 Filter Inspections

An inspection shall be performed annually and during any plant shut down of the filters in Filter Rooms A and B. The inspections shall be performed to verify the placement, integrity, and particle loading of the filters. Inspections are optional for dust collectors/filters that vent to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

D.3.7 Broken or Failed Filter Detection

In the event that filter failure has been observed:

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

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

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

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain daily records of visible emission notations of the exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6. A record shall be kept of the number of cartridge filters replaced.
- (d) To document compliance with Condition D.3.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (e) Four (4) breakdown mills, identified as units 006, 007, 008, and 009, constructed in 1992, 1994, 1989, and 1989, respectively, each with a maximum throughput of 42,000,000 lb/yr, exhausting inside the building;
- (f) One (1) extruder, identified as unit 010, with a maximum throughput of 13,423,882 lb/yr, exhausting inside the building;
- (g) One (1) rubber curing operation, identified as unit 400, comprised of forty-seven (47) presses, thirty-three (33) of which were installed between 1960 and 1982, eleven (11) of which were added in 1999, and three (3) of which were added in 2002 (these three are identified as IM-01, IM-02, and IM-03), with a combined maximum throughput of 5,764 pounds of rubber per hour, some with associated finish grinding steps, with emissions controlled by a dust collector that exhaust inside the building;
- (h) Eighteen (18) rubber injection molding presses, identified as unit 400, constructed in 2003, each with a maximum capacity of 116 pounds per hour, and associated insignificant grinding wheels, identified as unit 600, with emissions controlled by dust collectors that exhaust inside the building;
- (i) Two (2) curing operation autoclaves, identified as unit 401, the original installed prior to 1975 and a new autoclave installed in 1999, with a maximum combined throughput of 8,280 pounds molded rubber per hour and exhausting to stack 38 and stack 126, respectively;
- (j) Two (2) mold cleaners, identified as units 402 and 403, each with a maximum capacity of 180 pounds of plastic shot blast per hour, with emissions controlled by dust collectors that exhaust inside the building;
- (k) One (1) natural gas kolene unit, identified as unit 320, installed in 1990, rated at 2 MMBtu/hr, equipped with a venturi scrubber for control of particulate matter and exhausting to stack 42. The natural gas combustion operation of the kolene unit is exhausted from stack 43.
- (l) Wheelabrator metal shot blaster, identified as unit 301, equipped with a dust filter and exhausting inside the building with a maximum capacity of 29,400 pounds of metal shot per hour.
- (m) One (1) wheelabrator, identified as Wheelabrator #2, with a unit ID of 327.

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed below shall not exceed the listed allowable particulate emission rate. The emission rates are based on the following 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, if
P is 60,000 lbs/hr (30 tons/hr) or less

Equipment	Allowable Emission Rate (lb/hr)
Two mold cleaners (units 402 and 403)	0.82 each
Kolene salt stripping unit (unit 320)	5.62
Wheelabrator unit (unit 301)	24.82
Injection molding press (IM-01, IM-02, IM-03)	0.61 each
Transfer Molding press (TM-01)	0.82

- (a) One (1) kolene salt stripping tank to remove adhesive and paint materials, controlled by a venturi scrubber. Pursuant to permit 17-12-93-0112, issued January 30, 1990, the venturi scrubber shall be operated at a minimum collection efficiency of 90 percent for PM.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and SSM 033-15942-00013, issued April 8, 2003, the particulate from the eighteen (18) new injection molding presses (unit 400) shall not exceed 0.609 pounds per hour each when operating at a process weight rate of 116 pounds per hour, each.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and SSM 033-15942-00013, issued April 8, 2003, the allowable particulate matter emission rate from the forty-seven (47) existing presses (unit 400) shall not exceed the following weight rates:

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

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

- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shot blaster (unit 327) shall not exceed the allowable particulate emission rate based on 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

D.4.2 Rubber Throughput Limitations [326 IAC 2-2-3] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-2-3 (BACT), 326 IAC 8-1-6, and SSM 033-15942-00013, issued April 8, 2003, the Permittee shall comply with the following limitations:

- (a) The rubber processed by the eighteen (18) injection molding presses (unit 400), constructed in 2003, and the existing forty-seven (47) transfer and injection molding presses (unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emissions from the transfer and injection molding presses shall not exceed 6.23×10^{-3} pounds per pound rubber. This limit is equivalent to VOC emissions of less than one hundred thirty-one (131) tons per year from the eighteen (18) injection molding presses (unit 400), constructed in 2003, and the existing forty-seven (47) transfer and injection molding presses (unit 400), combined.
- (b) The Rubber Compound #17 processed by the eighteen (18) injection molding presses (unit 400), constructed in 2003, shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month. The aniline emissions from the injection molding presses shall not exceed 1.02×10^{-3} pounds per pound rubber. This limit is equivalent to aniline emissions of less than 0.23 grams per second from the eighteen (18) injection molding presses (unit 400).

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.4.4 Particulate Matter (PM)

In order to comply with D.4.1, the control equipment for PM control shall be in operation and control emissions from the mold cleaners, curing operation grinders, and kolene salt stripping tank at all times that the facilities are in operation.

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

D.4.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.6 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced”.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.4.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.2, the Permittee shall maintain records of the rubber processed by unit 400 and the Rubber Compound #17 processed by the eighteen (18) injection molding presses constructed in 2003.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly report of the information to document compliance with Condition D.4.2 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 “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Adhesive/Coating Application Operations and Cleaning Area

- (n) Adhesive/Coating Application Operations:
- (1) One (1) dip style coating line #2, identified as unit 322, installed in 1999, with a maximum capacity of 960 units per hour and one (1) insignificant natural gas-fired oven with a maximum capacity of 0.14 million Btu/hr, exhausting to stacks 128 and 127, respectively;
 - (2) One (1) automated coating line designated Auto Line #2, identified as unit 321, installed in 1999, consisting of two (2) booths, which apply adhesive cements and primer or cover coatings through high volume low pressure (HVLP) spray guns to a maximum of 7,200 metal inserts per hour and exhaust through stacks 121 and 122 with dry filters as particulate matter overspray control. The emission unit includes three (3) associated 0.4 MMBtu/hr indirect heaters, which are insignificant activities;
 - (3) One (1) adhesive/coating mixing room, identified as unit 302, installed in 1990, exhausting to stacks 112 and 113;
 - (4) Six (6) Chain-on-Edge (COE) systems each with dry filters as particulate matter overspray control:
 - (A) COE No. 1, identified as unit 303, installed prior to 1980, and exhausting to stacks 12, 13, 14, and 15;
 - (B) COE No. 2, identified as unit 304, installed in 1981, equipped with an electric oven, and exhausting to stacks 5 and 22;
 - (C) COE No. 3, identified as unit 305, installed in 1986, equipped with an electric oven, and exhausting to stacks 48, 49, and 51;
 - (D) COE No. 4, identified as unit 306, installed in 1988, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 69, 70, and 71;
 - (E) COE No. 5, identified as unit 307, installed in 1988, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 75, 76, and 77; and
 - (F) COE No. 6, identified as unit 308, installed in 1991, equipped with an insignificant natural gas-fired oven, and exhausting to stacks 82, 83, and 84;
 - (5) One (1) ID/OD No.1, with dry filters as particulate matter overspray control, identified as unit 309, installed in 1988, and exhausting to stacks 72, 73, and 74. The emission unit includes a 0.4 MMBtu/hr indirect gas-fired heater which is an insignificant activity;

SECTION D.5 FACILITY OPERATION CONDITIONS (Continued)

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

Adhesive/Coating Application Operations and Cleaning Area (Continued)

- (6) Two (2) Ronci adhesive dip coating lines, identified as units 312 and 313, both installed in 1986, and exhausting to stack 21;
- (7) One (1) automatic coating line (Auto Line #1) consisting of two (2) adhesive coating booths with overspray controlled by baffles, identified as unit 315, installed prior to 1980, and exhausting to stacks 16, 17, 18, and 19;
- (8) One (1) hand-operated spray booth, with overspray controlled by baffles, identified as unit 316, exhausting to stacks 8 and 9; and
- (9) One (1) channel mount color code operation, identified as unit 317; and
- (o) One spray gun cleaning area, identified as Unit 319, using toluene, xylene, and methyl isobutyl ketone.

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

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

D.5.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6]

Pursuant to CP 033-10248-000130 issued on January 28, 1999, the input VOC to the applicators of Auto Line #2 minus the VOC disposed of shall not exceed 16.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 16.0 tons per twelve (12) consecutive month period. This limit ensures that modifications made pursuant to permit CP033-10248-033, issued January 28, 1999, are less than the Prevention of Significant Deterioration significant level of 25 tons per year. Therefore, compliance with this condition renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), 40 CFR 52.21 and 326 IAC 8-1-6 not applicable to this modification.

D.5.2 VOC Control [326 IAC 2-2-3] [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate the following overspray controls on COE#2, COE#3, COE#4, COE#5, and COE#6.
 - (1) Programmable Logic Controls (PLC);
 - (2) Part fixture sensing;
 - (3) Overspray filters; and
 - (4) HVLP spray guns.
- (b) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate chain indexing on COE#6.
- (c) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate the following overspray controls on ID/OD #1.
 - (1) Programmable Logic Controls (PLC); and
 - (2) Overspray filters.

- (d) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall use low VOC adhesives for COE#2, COE#3, COE#4, COE#5, COE#6, and ID/OD #1, whenever possible.
- (e) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the input of volatile organic compounds (VOC) to the applicators of COE #6 minus the VOC disposed of shall be limited to less than 45 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (f) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the input of volatile organic compounds (VOC) to each of the applicators of COE #3, COE #4, and COE #5, minus the VOC disposed of shall be limited to less than 45 tons each per twelve (12) consecutive month period with compliance determined at the end of each month.
- (g) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the input of volatile organic compounds (VOC) to the applicators of ID/OD #1 minus the VOC disposed of shall be limited to less than 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (h) The input of volatile organic compound (VOC) to the applicators of COE #2 minus the VOC disposed of shall be limited to less than 70 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.5.3 New Source Toxics Control [326 IAC 2-4.1]

- (a) Pursuant to CP 033-10248-00013 issued on January 28, 1999, the input to the applicators of Auto Line #2 (unit 315) of any single HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to single HAP emissions of less than ten (10) tons per twelve (12) consecutive month period.
- (b) Pursuant to CP 033-10248-00013 issued on January 28, 1999, the input to the applicators of Auto Line #2 of combined HAPs shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to combined HAP emissions of less than twenty-five (25) tons per twelve (12) consecutive month period.

Due to these limitations, 326 IAC 2-4.1 (New Source Toxics Control) does not apply.

D.5.4 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to CP 033-2009-00013 issued August 22, 1991, CP 033-2143-00013 issued on October 22, 1991, CP 033-10248-00013 issued on January 28, 1999, and 40 CFR 52 Subpart P, the PM from the Autoline # 2, COE No. 1, COE No. 2, COE No. 3, COE No. 4, COE No. 5, COE No. 6, ID/OD #1, Autoline #1, and hand-operated spray booth shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

D.5.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP 033-2009-00013 issued August 22, 1991, CP 033-2143-00013 issued on October 22, 1991, CP 033-10248-00013 issued on January 28, 1999, particulate from the surface coating shall be controlled by a dry particulate filter or baffle, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.5.6 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR 63, Subpart A]

- (a) The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise

specified by Table 2 to 40 CFR 63, Subpart M. The Permittee shall comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.5.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.5.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.5.9 Monitoring

- (a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters and baffles. To monitor the performance of the dry filters and baffles, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

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

D.5.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC/HAP usage limits and/or the VOC/HAP emission limits established in Conditions D.5.1, D.5.2, and D.5.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (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 cleanup solvent usage for each month and the amount of VOC disposed of;
 - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.5.9, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) To document compliance with Condition D.5.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.5.11 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart M. The notification shall be submitted to the appropriate authority.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance

status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.5.12 Reporting Requirements

- (a) A quarterly report of the information to document compliance with Conditions D.5.1, D.5.2, and D.5.3, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as deemed by 326 IAC 2-7-1(34).
- (b) In order to demonstrate compliance with D.5.2(d), the permittee shall annually report to OAQ progress on replacing adhesives with low-VOC based adhesives.

D.5.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart Mmmm.
- (c) The significant permit modification application shall be submitted to:

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

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: New Coating Operations (GR-05)

New Coating Operations (GR-05)

- (p) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (q) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (r) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, to be installed in 2004, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (s) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) dip tanks; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

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

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

D.6.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6]

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

- (a) VOC emissions from COE#7 (Unit ID 324), COE#8 (Unit ID 325), the rotary line (unit 326), and Dip Line #3 (Unit ID 323) shall each be controlled by a regenerative thermal oxidizer, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. The overall efficiency of the thermal oxidizers shall be greater than eighty-one (81) percent.
- (b) The total amount of VOC delivered to the coating facilities described in Section D.6 shall be limited to less than 1,132 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with condition D.6.1(a) limits the potential to emit VOC from the coating facilities to less than 268 tons per year.

D.6.2 VOC Control [326 IAC 2-2-3] [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate the following overspray controls on COE#7, COE#8, and the Rotary Line.
- (1) Programmable Logic Controls (PLC);
 - (2) Part fixture sensing; and
 - (3) HVLP spray guns.
- (b) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate chain indexing on COE#7 and COE#8.

D.6.3 Particulate Matter (PM) 40 CFR Part 52, Subpart P

Pursuant to 40 CFR 52 Subpart P, the PM from COE#7, COE#8, and the Rotary Line shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

D.6.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by overspray filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.6.5 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified by Table 2 to 40 CFR 63, Subpart M. The Permittee shall comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

D.6.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.6.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.6.8 Volatile Organic Compounds (VOC) [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3, the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.6.1.

D.6.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.6.1 for each thermal oxidizer utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.6.10 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400°F, or at the temperature specified by the equipment manufacturer.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1(a), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

D.6.11 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.6.12 Monitoring

- (a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters. To monitor the performance of the overspray filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

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

D.6.13 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (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 cleanup solvent usage for each month and the amount of VOC disposed of.
 - (4) The weight of VOCs emitted for each compliance period.
 - (5) The continuous temperature records (on a hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.6.12, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) To document compliance with Condition D.6.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.6.14 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.

- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.6.15 Reporting Requirements

- (a) A quarterly report of the information to document compliance with Condition D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as deemed by 326 IAC 2-7-1(34).

D.6.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart Mmmm.
- (c) The significant permit modification application shall be submitted to:

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013

This form consists of 2 pages

Page 1 of 2

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: Boiler, Unit 501

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: Dual - Fired Boiler (Unit 501)
Parameter: No. 2 fuel oil consumption
Limit: Consumption of No. 2 fuel oil shall not exceed 1,126.2 kgal per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: Auto Line #2 (Unit 315)
Parameter: Single HAP usage
Limit: Less than 10 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: Auto Line #2 (Unit 315)
Parameter: Combination of HAPs
Limit: Less than 25 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: Auto Line #2 (Unit 315)
Parameter: VOC usage
Limit: Less than 16 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: COE #6 (Unit 308)
Parameter: VOC usage
Limit: Less than 45 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West St. Auburn, Indiana 46706
 Mailing Address: 207 South West St. Auburn, Indiana 46706
 Part 70 Permit No.: T033-6253-00013
 Facility: COE #3 (Unit 305)
 Parameter: VOC usage
 Limit: Less than 45 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West St. Auburn, Indiana 46706
 Mailing Address: 207 South West St. Auburn, Indiana 46706
 Part 70 Permit No.: T033-6253-00013
 Facility: COE #4 (Unit 306)
 Parameter: VOC usage
 Limit: Less than 45 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: COE #5 (Unit 307)
Parameter: VOC usage
Limit: Less than 45 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: COE #2 (Unit 304)
Parameter: VOC usage
Limit: Less than 70 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West St. Auburn, Indiana 46706
Mailing Address: 207 South West St. Auburn, Indiana 46706
Part 70 Permit No.: T033-6253-00013
Facility: ID/OD #1 (Unit 309)
Parameter: VOC usage
Limit: Less than 15 tons per twelve (12) month consecutive period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West Street, Auburn, Indiana 46706
 Mailing Address: 207 South West Street, Auburn, Indiana 46706
 Part 70 Permit No.: 033-6253-00013
 Facility: Unit 400
 Parameter: Rubber Throughput
 Limit: The rubber processed by the eighteen (18) new injection molding presses (Unit 400), constructed in 2003, and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 42,000,000 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West Street, Auburn, Indiana 46706
 Mailing Address: 207 South West Street, Auburn, Indiana 46706
 Part 70 Permit No.: 033-6253-00013
 Facility: Eighteen (18) new injection molding presses
 Parameter: Rubber Compound #17 Throughput
 Limit: The Rubber Compound #17 processed by the eighteen (18) new injection molding presses (Unit 400), constructed in 2003, and the existing forty-seven (47) transfer and injection molding presses (Unit 400) shall not exceed 15,811,800 pounds, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West Street, Auburn, Indiana 46706
 Mailing Address: 207 South West Street, Auburn, Indiana 46706
 Source Modification No.: 033-17701-00013
 Facility: COE#7, COE#8, Rotary Line, Dip Line #3
 Parameter: VOC
 Limit: Input of VOC to COE#7, COE#8, Rotary Line, Dip Line #3 shall not exceed 1,132 tons combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- ☉ 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**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cooper - Standard Automotive, Inc.
 Source Address: 207 South West St. Auburn, Indiana 46706
 Mailing Address: 207 South West St. Auburn, Indiana 46706
 Part 70 Permit No.: T033-6253-00013

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".	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="radio"/> 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:	

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**

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

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	February 13, 2004
Significant Permit Modification No.:	033-18530-00013
Permit Reviewer:	ERG/MP

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

New Coating Operations (GR-05)

- (a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (c) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

- (d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:
 - (1) Two (2) dip tanks; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

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

Insignificant Activities

- (a) Activities with emission equal to or less the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
 - (1) One (1) wheelabrator, identified as Wheelabrator #2, with a unit ID of 327. [326 IAC 6-3-2].
 - (2) One (1) phosphate line, identified as Proosphate Line #2.

Note that this construction is considered one project for all applicability purposes with the injection molding units permitted in PSD Significant Source Modification 033-15942-00013. The modification can be split up between two permits because each permit meets all the PSD requirements that a single PSD permit would have.

History

On July 26, 2002, Cooper - Standard Automotive, Inc. submitted an application to the OAQ requesting to add two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). These units were permitted in Significant Source Modification (SSM) 033-17701-00013, issued February 17, 2004. At the time the significant source modification was being processed, the Title V permit had not yet been issued. However, the Part 70 permit, T033-6253-00013, has now been issued (February 13, 2004.) Therefore, this Significant Permit Modification incorporates that approval into the source's Title V permit (T033-6253-00013).

This modification to an existing PSD major source is major because the potential to emit VOC is greater than the thresholds specified in 326 IAC 2-2-1(w).

The initial application for this modification was split up into two (2) permits: one (1) for the construction of eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600); and one (1) for the construction of the two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). The construction of all of these units combined will be considered one (1) project with respect to all rule applicability determinations as they are being performed within a short period of time. The construction is being split into two (2) separate permits for administrative purposes only. The source requested that the construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600) be placed in a permit by themselves because the source had a greater need to begin construction on those presses as soon as possible. The modification can be split up between two permits because each permits meets all the PSD requirements that a single PSD permit would have.

Enforcement Issue

- (a) IDEM is aware that COE #2 was constructed after the finalization of the PSD rules and should have undergone a PSD review in 1981.
- (b) IDEM is reviewing this matter and will take appropriate action. In addition, IDEM is reviewing other issues that are discussed in the Title V permit (033-6253-00013) Technical Support Document. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

The initial design of the equipment covered by this permit called for separate stacks for the booths and drying ovens. However, since submitting the original application, the facility has agreed to utilize thermal oxidation to control VOC emissions and the final stack parameters have not been determined.

Recommendation

The staff recommends to the Commissioner that the Part 70 PSD Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on July 26, 2002.

No notice of completeness was mailed to the source.

Emission Calculations

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

Potential To Emit of Modification

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

This table reflects the PTE before controls of the complete modification including the equipment in this permit (17701) and the previous permit (15942). Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	58.52
PM-10	58.52
SO ₂	0.01
VOC	1,205.04
CO	1.4

Pollutant	Potential To Emit (tons/year)
NO _x	1.66

HAP's	Potential To Emit (tons/year)
1,1,1-Trichloroethane	0.14
1,1-Dichloroethene	0.02
1,3-Butadiene	0.09
2-Butanone	0.09
2-Chloro-1,3-Butadiene	0.08
4-Methyl-2-Pentanone	5.48
Acetaldehyde	0.06
Acetonitrile	0.05
Acetophenone	0.01
Acrylonitrile	0.01
Aniline	9.33
Benzene	0.42
Benzidine	0.04
Bis(2-Ethylhexyl)phthalate	0.11
Carbon Disulfide	5.01
Carbon Tetrachloride	0.79
Carbonyl Sulfide	4.01
Chloroform	0.22
Chloromethane	0.06
o-Cresol	0.94
Chromium	21.38
Cumene	0.02
Di-n-butylphthalate	0.09
Ethylbenzene	65.88
Formaldehyde	1.73
Glycol Ethers	10.34
Hexane	0.29
Isocatane	0.04
Lead	0.38
Manganese	0.42
Methylene Chloride	0.45
MEK	9.05
MIBK	447.56
Naphthalene	0.02
o-Toluidine	0.04
Phenol	7.51
Propylene Oxide	0.33
Selenium	7.31
Styrene	0.76
t-Butyl Methyl Ether	0.06
Tetrachloroethene	0.02
Toluene	574.68
Xylenes	333.28
TOTAL	1,508.60

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

Justification for Modification

The Part 70 source is being modified through a PSD Part 70 Significant Source Modification and a PSD Part 70 Significant Permit Modification. The modification is comprised of eighteen (18)

rubber injection molding presses and associated grinding operations (Unit ID 600), two (2) chain-on-edge lines, one (1) rotary line, and one (1) dip line. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) as the potential to emit of VOC from the entire modification is greater than twenty-five (25) tons per year and pursuant to 326 IAC 2-7-10.5(f)(6) as the potential to emit a single HAP from the entire modification is greater than ten (10) tons per year and the potential to emit any combination of HAPs from the entire modification is greater than twenty-five (25) tons per year. The permit modification is being performed pursuant to 326 IAC 2-7-12(d).

County Attainment Status

The source is located in DeKalb County.

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

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

Source Status

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

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

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

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification. This table displays the potential to emit of the entire modification, including the injection molding presses, as the emissions from the entire modification are looked at for rule applicability determinations.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	Combined HAPs
18 Rubber Injection Molding Presses (Unit ID 400) and associated grinding (Unit ID 600)	1.14	1.14	0	56.9 ⁴	0	0	27.29 ^{4,5}
Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), Rotary Line (Unit 326)	5.73 ²	5.73 ²	0	Less than 68 ¹	0	0	Less than 265 ¹
Combustion Sources ³	0.13	0.13	0.01	0.09	1.40	1.66	Neg
Total	7.00	7.00	0.01	124.99	1.40	1.66	292.29
PSD Threshold Level	25	15	40	40	100	40	---

¹ This limit is the combined limit for the equipment being added as part of this permit (Dip Line #3, COE #7, COE#8, and Rotary Line).

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

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

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

⁵ Note that these units, in combination with the 47 existing transfer and injection molding presses, are subject to a rubber throughput limit and a Rubber Compound #17 throughput limit. The 18 new presses and the 47 existing presses shall not process greater than 42,000,000 pounds of rubber, combined, per 12 consecutive month period. The 18 new presses shall not process greater than 15,811,800 pounds of Rubber Compound #17, combined, per 12 consecutive month period. The VOC emissions shall not exceed 6.23x10⁻³ pounds per pound rubber and the aniline emissions shall not exceed 1.02x10⁻³ pounds per pound rubber. These limits are equivalent to VOC emissions less than 131 tons of VOC per year from the 18 new presses and 47 existing presses, combined, and aniline emissions less than 0.23 grams per second from the 18 new presses. These equipment are permitted in permit PSD SSM 033-15942-00013.

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

Federal Rule Applicability

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

- (b) The new coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart M MMMM (Surface Coating of Miscellaneous Metal Parts and Products) because the source uses over 250 gallons per year of coatings containing HAP and is a major source of HAPs. The source has not chosen the method of compliance yet.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the coating lines except when otherwise specified by 40 CFR 63, Subpart M MMMM.

Pursuant to this rule, the Permittee must comply with Subpart M MMMM on and after the date 3 years after the effective date of Subpart M MMMM, or accept and meet an enforcement HAP emissions limit below the major source threshold prior to this date. The Permittee must submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) one (1) year after the effective date of Subpart M MMMM. The Permittee must submit an application for a significant permit modification no later than the date that the Notification of Compliance Status, specified in 40 CFR 63.9(h), is submitted. This date is based on the method of compliance chosen.

The new coating lines are also subject to 40 CFR 63, Subpart P PPPP (Plastic Parts Surface Coating) because the source is major for HAPs and performs coating of plastic parts. Compliance with this rule will be demonstrated by compliance with 40 CFR 63, Subpart M MMMM.

- (c) This modification is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM) as these units are subject to 40 CFR, Subpart M MMMM (Surface Coating of Miscellaneous Metal Parts and Products).

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

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

COE #2 was constructed in 1981 and should have undergone a PSD BACT review. The BACT analysis and accompanying requirements were included in the Title V permit.

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

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

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

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

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

In 2002, the source received a source modification, 033-14752-00013, to construct three (3) injection molding presses and one (1) transfer molding press. Note that to this date, only the three (3) injection molding presses have been constructed and the source has no intentions of constructing the one (1) transfer molding press. The source accepted limits on this modification to render the requirements of 326 IAC 2-2 not applicable.

The construction of the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600), (included in SSM 033-15942-00013), and the construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), (included in this permit) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the modification to an existing major stationary source has the potential to emit greater than the PSD applicability level of forty (40) tons per year for VOC. The potential to emit of PM and PM10 from the entire modification is limited to less than twenty-five (25) and fifteen (15) tons per year, respectively, by this permit which requires that the fabric filters for PM and PM10 control be in operation and control emissions from Dip Line #3, COE #7, COE #8, and Rotary Line at all times that these lines are in operation.

Pursuant to 326 IAC 2-2-3, the source conducted a BACT analysis and submitted a PSD permit application on July 26, 2002, for a Significant Source Modification to permit the construction and operation of the new coating operations. See Appendix B for a complete review of the BACT analysis.

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

326 IAC 2-4.1 (Hazardous Air Pollutants)

The construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), is not subject to the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) because 326 IAC 2-4.1 only applies to the construction of a new or reconstructed "process or production unit." A "process or production unit" is defined as "any collection of structures and/or equipment, that processes, assembles, applies, or otherwise uses material inputs to produce or store an intermediate or final product. A single facility may contain more than one process or production unit." The new units that are part of this modification do not constitute a "process or production unit" because they cannot, by themselves or as a group, produce a product or intermediate. The existing "process or production lines" will not be considered reconstructed because less than fifty percent (50%) of the fixed capital cost of a comparable entirely new emissions unit will be spent. Also the NESHAP, 40 CFR 63, Subparts PPPP and MMMM were recently signed. Therefore, a NESHAP applies to these units and 326 IAC 2-4.1 is not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

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

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

- (a) 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 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.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from COE #7, COE #8, and the rotary line shall be limited to 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:

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

Under the rule revision, particulate from the surface coating shall be controlled by a dry particulate filter or baffle and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) There are no particulate emissions expected from the dip coating line (DIP Line #3), therefore, this rule does not apply to this unit.

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

The construction of the (two (2) chain-on-edge lines, one (1) rotary line, one (1) dip line, is subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds) because this operation has the potential to emit greater than twenty-five (25) tons per year VOC. Pursuant to 326 IAC 8-1-6, the construction of these units must reduce VOC emissions using the Best Available Control Technology (BACT). This requirement will be satisfied by complying with 326 IAC 2-2-3 (Prevention of Significant Deterioration). IDEM determined that installing and operating a thermal oxidizer on the coating operation is representative of BACT. See Appendix B for a complete review of the BACT analysis.

326 IAC 8-6 (Organic Solvent Emission Limitations)

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

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

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

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a

result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

- (a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Proposed Changes

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

.....

New Coating Operations (GR-05)

- (p) **One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:**
 - (1) **Two (2) booths, with particulate emissions controlled by fabric filters, and**
 - (2) **Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.**
- (q) **One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:**
 - (1) **Two (2) booths, with particulate emissions controlled by fabric filters, and**
 - (2) **Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.**

- (r) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, to be installed in 2004, and consisting of the following:**
 - (1) Two (2) booths, with particulate emissions controlled by fabric filters; and**
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.**

- (s) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:**
 - (1) Two (2) dip tanks; and**
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.**

D.5.2 VOC Control [326 IAC 2-2-3] [326 IAC 8-1-6]

- (h) The input of volatile organic compound (VOC) to the applicators of COE #2 minus the VOC disposed of shall be limited to less than 70 tons per twelve (12) consecutive month period ~~in the~~ **with** compliance determined at the end of each month.**

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: New Coating Operations (GR-05)

New Coating Operations (GR-05)

- (p) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (q) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters, and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (r) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, to be installed in 2004, and consisting of the following:
- (1) Two (2) booths, with particulate emissions controlled by fabric filters; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.
- (s) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, to be installed in 2004, controlled by a thermal oxidizer, and consisting of the following:
- (1) Two (2) dip tanks; and
 - (2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

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

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

D.6.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6]

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

- (a) VOC emissions from COE#7 (Unit ID 324), COE#8 (Unit ID 325), the rotary line (unit 326), and Dip Line #3 (Unit ID 323) shall each be controlled by a regenerative thermal oxidizer, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. The overall efficiency of the thermal oxidizers shall be greater than eighty-one (81) percent.

- (b) The total amount of VOC delivered to the coating facilities described in Section D.6 shall be limited to less than 1,132 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with condition D.6.1(a) limits the potential to emit VOC from the coating facilities to less than 268 tons per year.

D.6.2 VOC Control [326 IAC 2-2-3] [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate the following overspray controls on COE#7, COE#8, and the Rotary Line.
- (1) Programmable Logic Controls (PLC);
 - (2) Part fixture sensing; and
 - (3) HVLP spray guns.
- (b) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate chain indexing on COE#7 and COE#8.

D.6.3 Particulate Matter (PM) 40 CFR Part 52, Subpart P

Pursuant to 40 CFR 52 Subpart P, the PM from COE#7, COE#8, and the Rotary Line shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

D.6.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by overspray filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.6.5 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified by Table 2 to 40 CFR 63, Subpart M. The Permittee shall comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

D.6.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M.
- (b) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous

metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

- (1) All coating operations as defined in 40 CFR 63.3981;**
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;**
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and**
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.**
- (c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.**

D.6.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.6.8 Volatile Organic Compounds (VOC) [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3, the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.6.1.

D.6.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.6.1 for each thermal oxidizer utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.6.10 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400°F, or at the temperature specified by the equipment manufacturer.**
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1(a), as approved by IDEM.**
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.**

D.6.11 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.6.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.6.12 Monitoring

- (a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters. To monitor the performance of the overspray filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

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

D.6.13 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.

- (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 cleanup solvent usage for each month and the amount of VOC disposed of.
- (4) The weight of VOCs emitted for each compliance period.
- (5) The continuous temperature records (on a hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
- (6) Daily records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.6.12, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.
- (c) To document compliance with Condition D.6.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.6.14 Notification Requirements [40 CFR 63.3910]

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.6.15 Reporting Requirements

- (a) A quarterly report of the information to document compliance with Condition D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as deemed by 326 IAC 2-7-1(34).

D.6.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.**
- (b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart MMMM.**
- (c) The significant permit modification application shall be submitted to:**

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

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

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West Street, Auburn, Indiana 46706
Mailing Address: 207 South West Street, Auburn, Indiana 46706
Part 70 Permit No.: 033-6253-00013
Facility: COE#7, COE#8, Rotary Line, Dip Line #3
Parameter: VOC
Limit: Input of VOC to COE#7, COE#8, Rotary Line, Dip Line #3 shall not exceed 1,132 tons combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed modification shall be subject to the conditions of Part 70 Significant Source Modification No. 033-17701-00013, and the operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 033-18530-00013.

Appendix A: Emission Calculations

Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions

Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SPM 033-18530-00013
Pit ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Combined Curing Operation (Unit 400) - VOC and HAP

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

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

METHODOLOGY

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

Appendix A: Emission Calculations
Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SPM 033-18530-00013
Pit ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

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

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

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

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

Limited Aniline Emissions

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

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

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

Appendix A: Emission Calculations
Coating Operation Emissions (GR-05) - VOC Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SPM 033-18530-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Dip Line #3 (Unit 323)

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

Worst Case Combination of Primer and Adhesive

230.57 0.00

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids	Transfer Efficiency and Board Efficiency
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76	20%
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA	20%
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA	20%
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	12.35	75%	90%	1.23	1.32	20%
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88	20%
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53	20%
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA	20%
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA	20%
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA	20%
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82	20%

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

305.80 20.36 2.04

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids	Transfer Efficiency
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76	20%
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA	20%
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA	20%
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88	20%
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53	20%
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA	20%
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA	20%
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA	20%
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82	20%

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

305.80 16.53 1.65

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

Rotary Line (Unit 326)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids	Transfer Efficiency
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76	20%
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA	20%
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	128.88	4.76	75%	90%	0.48	NA	20%
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	12.35	75%	90%	1.23	NA	20%
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88	20%
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53	20%
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	176.92	5.48	75%	90%	0.55	NA	20%
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA	20%
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA	20%
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82	20%
<i>Worst Case Combination of Primer and Adhesive or Worst Case Top Coat</i>													305.80	20.36	2.04				

METHODOLOGY

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

Appendix A: Emission Calculations
 Coating Operation Emissions (GR-45) - HAP Emissions
 Company Name: Cooper - Standard Automotive, Inc.
 Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
 Permit Number: SPW 03-1630-0003
 PU ID: 03-1630-0003
 Reviewer: EROAMP
 Date: 1/10/03

Dip Line #3 (Unit 323)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	o-Cresol Emissions (ton/yr)	Phenol Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Lead Emissions (ton/yr)	Benzene Emissions (ton/yr)	Chloroform Emissions (ton/yr)	Selenium Emissions (ton/yr)										
7326 - Primer	7.38	0.0019	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	91.31	0.19	0.68	1.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
7329 - Primer	7.45	0.0019	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.08	88.07	0.00	1.53	0.00	1.53	5.35	0.08	0.08	0.08	0.08	0.08	0.00										
7360 - Adhesive	7.67	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	2.50	19.15	117.11	0.08	0.00	0.00	0.00	0.00										
7878 - Adhesive	8.00	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	11.90	62.58	0.00	0.00	0.00	0.00	0.00	1.49										
Worst Case Combination of Primer and Adhesive																																							
																	0.08	91.31	0.19	1.53	1.85	13.43	67.93	117.18	0.16	0.08	0.08	0.00	1.49										

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachloride (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Glycol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)							
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	118.75	0.25	0.88	2.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	1.99	0.00	1.99	6.96	0.10	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
7878 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00					
7380 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
7642 - Adhesive	7.62	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
7842 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
7878 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																																										
																	0.13	118.75	0.25	1.99	2.40	17.47	88.35	152.42	0.21	0.10	0.11	0.11	1.94	4.97	7.12	0.14										

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Gallons of Material (gal/Unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachloride (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Glycol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)			
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	118.75	0.25	0.88	2.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	1.99	0.00	1.99	6.96	0.10	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7878 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00		
7380 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7642 - Adhesive	7.62	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
7842 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7878 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																																						
																	0.13	118.75	0.25	1.99	2.40	17.47	88.35	152.42	0.21	0.10	0.11	0.11	1.94	4.40	7.12	0.14						

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SPM 033-18530-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Combined
 Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

3.8

33.3

Pollutant

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SPM 033-18530-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

*

HAPs - Organics

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

HAPs - Metals

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

Methodology is the same as page 1.

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

Appendix B (11/18/2003)

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) DETERMINATION

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	February 13, 2004
Significant Permit Modification No.:	033-18530-00013
Permit Reviewer:	ERG/MP

Project Description

This PSD permit allows for the construction of four (4) new coating lines - COE #7 (Unit 324), COE #8 (Unit 325), Rotary Line (Unit 326), and Dip Line #3 (Unit 323). The uncontrolled emissions from all four units combined is 1,132 tons VOC/year. These units are subject to the requirements of 326 IAC 8-1-6 and 326 IAC 2-2. The construction of these coating lines is considered one (1) project with the construction of eighteen (18) rubber injection molding presses (Unit 400). For administrative purposes, the presses were permitted in a separate action (Significant Source Modification and Major Modification under Prevention of Significant Deterioration, SSM 033-15942-00013).

BACT Analysis

The source is located in DeKalb County, which is designated as attainment or unclassifiable for all criteria pollutants. Based upon the emission calculations, the modification exceeds the PSD significant threshold levels stated in 326 IAC 2-2-1 for VOC. Therefore, VOC emissions were reviewed pursuant to the PSD Program (326 IAC 2-2). The PSD Program requires a BACT review and air quality modeling.

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

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

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

limitations. Such reductions are necessary to ensure that emissions from new or modified sources will not cause a significant deterioration of air quality.

The following BACT determinations are based on the following information:

- The PSD permit application dated July 2002, submitted by Cooper-Standard on August 14, 2002;
- Additional documentation provided by Cooper-Standard subsequent to the submittal of the application;
- Information from Cooper-Standard's vendors/suppliers;
- The OAQPS control cost manual; and
- The EPA RACT/BACT/LAER (RBLCL) Clearinghouse.

BACT ANALYSIS FOR VOC FOR NEW COE #7, COE #8, ROTARY LINE, AND DIP LINE #3

Cooper-Standard proposes as BACT the use of thermal oxidizers for all four coating units, chain indexing on COE #7 and #8, and overspray controls on the three spray booths. IDEM agrees with Cooper-Standard proposed BACT. The following discussion outlines the BACT analysis as proposed by Cooper-Standard and IDEM's review of the recommended BACT.

Step 1 - Identify Control Options

The surface coating equipment at Cooper are sources of VOC. The following table presents the control alternatives considered in this analysis.

BACT Control Alternative	Method of VOC Control	Technically Feasible?
Direct Flame Afterburners (Thermal Incinerators)	VOC emissions from the coating equipment are contained and incinerated.	Y
Indexing Spray Guns	Parts to be coated are stopped momentarily in front of the spray guns to provide a higher coating transfer efficiency	Y
Overspray Controls ^a	The portion of coating that does not adhere to the parts is reduced and collected by these various controls	Y
Water-Based Coatings	VOCs are present in many coatings due to the organic solvents used. Water-based coatings do not contain VOCs	N
Low VOC Coatings ^b	The coatings applied to the parts contain less VOCs, resulting in fewer VOC emissions	N
Catalytic Afterburners	VOC emissions react with a catalyst and are subsequently destroyed	N
Adhesive Preheaters	Adhesives containing VOCs are heated prior to application to decrease viscosity, increase the transfer efficiency, and decrease cure time	N
Condensers	VOCs are condensed into liquid form and are not released to air	N
Carbon Adsorbers	VOCs are adsorbed onto a carbon media and are not released to air	N
Follower Guns	Follower guns move along with the parts being coated, thus increasing the transfer efficiency and reducing overspray and VOC emissions	N

^a Overspray controls are comprised of a combination of the following controls: programmable logic control (PLC), part fixture sensing, and chain indexing (only on COE#7 and COE #8).

^b As part of the 1991 and 2003 BACT determinations, low VOC coatings were required "when possible"; however, low VOC coatings are not feasible in most applications at this facility.

Step 2 - Eliminate Technically Infeasible Control Options

Seven of the control alternatives investigated were found to be technically infeasible. The reasons for those findings are presented here:

Water-Based Coatings:

Since Cooper's products are used in automobiles, the rubber to metal bonding must meet specific performance and safety criteria. The adhesives that Cooper uses are a class of high performance adhesives that are so unique that only three companies in the world supply the rubber to metal coatings that meet the necessary criteria. Given this unique set of circumstances, the use of water-based coatings has both logistical and technical drawbacks. Many of the polymers used in the solvent-based rubber to metal coatings are custom manufactured by the supplier and not available on the open market. Therefore, incorporating these materials into water-based coatings is not in Cooper's control. Technical difficulties with water-based coatings include problems with storage, temperature sensitivity, viscosity, agitation, surface treatment, bonding integrity, customer acceptance, and cost. Inadequate mixing of water-based coatings or solids dropping out of solution can cause bond failures, while excessive agitation can cause foaming which adversely affects the bonding process. Exposure to heat often degrades the bonding capability of water-based coatings. Consistent with their permit requirements, Cooper evaluates the feasibility of using a water-based (or low VOC) coating for each part on a case-by-case basis. A number of factors affect the feasibility, including part shape, type of rubber used, and such factors as customer specifications for compression, vibration, and part life. No other similar facility uses 100 percent water-based coatings.

Low VOC Coatings:

Low VOC coatings were included as part of the 1991 and 2003 BACT determinations for Cooper-Standard's surface coating equipment. However, the use of low VOC coatings were only required "when possible" or "when compatible," because solvent-based coatings that have low VOC content are not yet available for all rubber to metal applications. Surface coating operations that are used in the production of noise, vibration, and harshness (NVH) parts differ from what is typical of surface coating operations in general. In rubber to metal applications, the coating is used for the purpose of binding the rubber to metal surfaces rather than for cosmetic purposes or for corrosion protection. In a typical surface coating operation, the entire part is generally coated and a wide range of coatings are available. In rubber to metal applications, however, the metal carrier is coated first with a primer and then followed with an adhesive on the surface that will be bonded to the rubber by polymeric reactions under heat and pressure. For proper bonding to occur, it is essential that the primer is compatible with the adhesive metal carrier. Additionally, the coating applied to the part must be very thin. This need for compatibility and a thinner than usual coating thickness creates a situation in which the choices of primers and adhesives that can be used are limited. Cooper must mix the adhesive coatings precisely to the specifications of the suppliers. Suppliers have indicated that because the technical difficulties of developing low VOC coating, current research is focused on developing new water-based coatings.

Catalytic Afterburners:

Cooper has indicated that its bonding process is not suitable for catalytic incineration for three main reasons:

- C The large amount of tacky overspray from the operation could blind the catalyst;
- C Batch-wise processing results in highly variable emission rates; and
- C Many of the compounds in the adhesives could poison or mask the catalyst.

These claims were supported by letters from two vendors. IDEM agrees that catalytic afterburners are technically infeasible for these reasons.

Adhesive Preheating:

The suppliers of Cooper's adhesives stated that since the adhesives are designed to react with heat, preheating the adhesives prior to their application could affect the reaction that takes place for bonding to occur. This could result in failure of the bonds during field application. Additionally, adhesive preheating of solvent based material could generate vapor sufficient to form an ignitable mixture with the air near the surface of the liquid and creates safety concerns related to increased fire and explosion hazards at the paint booths.

Condensers:

According to the HAP Control Handbook, condensers are effective for inlet concentrations exceeding 5,000 ppmv and for flow rates less than 2,000 scfm. Exhaust parameters at Cooper are less than 100 ppmv and 8,000 scfm. Therefore, this control is considered infeasible because the gas stream is too dilute.

Carbon Adsorbers:

According to the HAP Control Manual, carbon adsorbers typically operate efficiently when VOCs are in the 1,000-10,000 ppm range. The U.S. EPA Air Pollution Technology Fact Sheet on Adsorbers indicates that the working range for carbon adsorbers is 400-2,000 ppm. According to both, adsorption efficiencies decrease significantly at lower inlet concentrations. The inlet concentration for these new surface coating units is less than 100 ppmv. Therefore, this control technology is considered infeasible.

Follower Guns:

Follower guns were installed on COE #4 and COE #5 following the issuance of the permit requiring them. However, Cooper was unable to get the followers to keep pace with the moving parts. As a result, the system did not adequately coat the parts and overspray was not reduced as intended. Therefore, follower guns were found to be incompatible with the existing equipment. Where the follower guns were removed, Cooper installed programmable logic controls and part fixture sensors to reduce overspray.

Step 3 - Rank Technically Feasible Control Options by Control Effectiveness

There are three remaining technically feasible options for controlling VOC emissions from the operations at Cooper:

Options for VOC Control	Overall VOC Control Efficiency	Cost Effectiveness
Thermal Oxidation	81% ^a	\$7,137 - \$8,745/ton
Overspray Controls (proposed BACT)	20-80% ^b	unavailable
Overspray Controls plus Indexing Spray Guns	2% ^c	\$42,417

^a Use of a permanent enclosure with a minimum capture efficiency of 85 percent and thermal oxidation with minimum 95% destruction efficiency. Total enclosures (100% capture) are not feasible for this operation because the organic materials used in these coatings accumulate and create fire, explosive, and worker exposure hazards. These capture and control efficiencies are based on vendors guarantees of long-term performance.

^b There is no data available for this type of Industry. This range is based on estimated VOC reduction from operator training. These robotic systems are assumed to do as well or better than the best trained spray gun operator.

^c The control efficiency for indexing spray guns is based on a study performed by Cooper to determine the effectiveness of this technology.

Step 4 - Analysis of Technically Feasible Control Options

Cooper-Standard has agreed to install all of the technically feasible control options for these surface coating operations. These controls are as follows:

- C Thermal Oxidation on COE #7, COE #8, Rotary Line, and Dip Line #3
- C Overspray Controls on COE #7, COE #8, and Rotary Line; and
- C Indexing Spray Guns on COE #7, COE #8

Step 5 – BACT Selection

IDEM has determined that BACT for these new coating lines is the use of thermal oxidation and various overspray controls to reduce VOC. IDEM understands the limitations involved with the use of low VOC coatings at Cooper, but maintains the position stated in the past determinations that Cooper should continue to investigate the use of low VOC coatings and use them, whenever possible.

The controls that will be considered BACT are described below:

Thermal Oxidation for COE#7, COE #8, Rotary Line, and Dip Line #3

Overspray Controls for COE#7, COE #8, and Rotary Line

- C PLC Controls: The PLC controls the application of primer and adhesive materials by starting and stopping the spray guns at specified intervals, which reduces the amount of spray between part fixtures on a spindle, thereby minimizing material overspray.
- C Part Fixture Sensing: Sensors are placed on the equipment to verify that a fixture has been inserted into a spindle. Should a spindle not contain a part fixture, neither primer nor adhesive material will be sprayed as that spindle passes in front of the spray guns.
- C HVLP Spray Guns: These spray guns utilize a high volume of air at low pressure (10 psi maximum) to atomize the coatings, thereby increasing transfer efficiency and reducing overspray.
- C Indexing Spray Guns (COE#7, COE #8 only): With chain indexing, the part stops in front of a stationary spray gun, the gun sprays, and then the chain indexes (moves) to the next part. This system improves the coating transfer efficiency on each metal part, thereby reducing material usage.

The overspray controls are not applicable to the Dip Line #3 due to the nature of the equipment.

Use of low VOC Coatings for COE#7, COE #8, Rotary Line, and Dip Line #3

Cooper must continue to investigate the use of low-VOC adhesives in their processes and will use low-VOC coatings and adhesives, whenever possible. Cooper must submit an annual report on their progress on replacing adhesives with low-VOC-based adhesives.

VOC emission Limitations

Emissions of VOC from these units shall be limited to no more than 265 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will be achieved by limiting VOC input to these units to less than 4,417 tons per twelve (12) consecutive month, and requiring a VOC control efficiency of ninety-four (94) percent for the thermal oxidizer.