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June 4, 2004

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TO: Interested Parties / Applicant

RE: Nishikawa Standard Company / MSM 087-18586-00031

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 9/16/03

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**Nishikawa Standard Company  
324 Morrow Street  
Topeka, Indiana 46571**

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

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 087-18586-00031	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 4, 2004

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (b) One (1) Spray Line, identified as X-037, equipped with six (6) high volume low pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 mmBtu/hr each and exhausting to stacks PEF-B11 and PEF-B12.

(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 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Spray Line, identified as X-037 is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as each potential VOC emission is less than 25 tons per year. Any change or modification from each line that would increase each potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

#### D.1.2 Particulate Emissions [326 IAC 6-3-2 (Process Operations)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the spray line, identified as X-037 shall be considered in compliance with this rule using either dry filters, waterwash, or an equivalent control and the owner or operator shall operate the control device in accordance with the manufacturer's specifications.

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

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

- (a) One (1) SDM EA Extrusion Line, identified as emission unit X-014, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour (mmBtu/hour) each, exhausting to vents PEV-B7 and PEV-B8, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 mmBtu/hr each, exhausting to vents PEF-B7 and PEF-B3, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 mmBtu/hr each, and exhausting to vent PEF-B9.

(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 (VOCs) [326 IAC 8-1-6]

SDM EA Extrusion Line, identified as emission unit X-014, which includes hot air rubber curing operation is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as its potential VOC emission is less than 25 tons per year. Any change or modification from this line that would increase each potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

#### D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

SDM EA Extrusion Line, identified as emission unit X-014, which includes hot air rubber curing operation is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control), as its HAPs PTEs are less than the major levels. Any change or modification from this line that would increase the single HAP PTE to 10 tons per year and combined HAPs PTE to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification

#### Source Background and Description

Source Name:	Nishikawa Standard Company
Source Location:	324 Morrow Street, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3061
TV Operation Permit No.:	087-7182-00031
Permit Issuance Date:	April 12, 2001
Minor Source Modification	087-18586
Minor Permit Modification:	087-18821
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Nishikawa Standard Company relating to the operation the following new emission units to be used in the manufacture of automotive weather stripping:

- (a) One (1) SDM EA extrusion line, identified as emission unit X-014, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour (mmBtu/hour) each, exhausting to vents PEV-B7 and PEV-B8, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 mmBtu/hr each, exhausting to vents PEF-B7 and PEF-B3, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 mmBtu/hr each, and exhausting to vent PEF-B9; and
- (b) One (1) spray line, identified as X-037, equipped with six (6) high volume low pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 mmBtu/hr each and exhausting to stacks PEF-B11 and PEF-B12.

#### History

On February 25, 2004, Nishikawa Standard Company submitted an application to the OAQ requesting to add additional surface coating booth and replacement of the existing extrusion line. Nishikawa Standard Company was issued a Part 70 permit on April 12, 2001.

#### Existing Approvals

The source was issued a Part 70 Operating Permit 087-7182-00031 on April 12, 2001. The source has since received the following:

- (a) First Significant Permit Modification No.: 087-16667, issued on January 15, 2003;

- (b) First Administrative Amendment No.: 087-15216, issued on January 24, 2002; and
- (c) First Minor Permit Modification No.: 087-14376, issued on July 20, 2001.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PEV-B7	Extrusion Line X-014	35	1.33	4,400	644
PEF-B3	Extrusion Line X-014	35	1.5	4,400	644
PEF B7	Extrusion Line X-014	35	1.5	4,400	644
PEV-B8	Extrusion Line X-014	35	1.33	N/A	482
PEF-B9	Extrusion Line X-014	35	1.0	250	260
PEF- B10	Spray Line X-037	35	1.0	1,200	ambient
PEF-B11	Spray Line X-037	35	1.33	3,000	450
PEF-B12	Spray Line X-037	35	1.33	3,000	450

**Recommendation**

The staff recommends to the Commissioner that the Minor Source Modification and Minor 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 February 25, 2004., Additional information was received on March 11, 2004.

**Emission Calculations**

See Page 1 through 4 TSD Appendix A of this document for detailed emissions calculations .

**Potential To Emit**

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.”

Pollutant	Potential To Emit (tons/year)
PM	10.98
PM-10	11.06
SO <sub>2</sub>	0.01
VOC	14.74
CO	1.26
NO <sub>x</sub>	1.5

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

HAP's	Potential To Emit (tons/year)
Hexane	0.027
Ethylene Glycol	0.21
Formaldehyde	0.001
TOTAL	5.92

Note: The Rubber extruding and the hot air curing were calculated as a combined HAPs at 5.7 tons/year (detailed calculation is on page 4 of 4 TSD App A of this permit).

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM) or PM10 are each equal to or greater than 5 tons per year .Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5 (d), Minor Source Modification;

or

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than 10 tons per year .Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5 (d), Minor Source Modification; and
- (c) The Part 70 is being modified under Part 70 Minor Permit Modification, 326 IAC 2-7-12(b), since the change does not qualify as an Administrative Amendment nor does it qualify under Significant Permit Modification (the removal of the 183 tons of VOC per year limit does not constitute a relaxation, since the limit left in the permit is more stringent).

**Source Status**

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

Pollutant	PTE (tons.year) from Part 70 087-7182		PTE (tons.year) from SSM 087-12244	PTE (tons.year) from MSM 087-14331	PTE (tons.year) from MSM 087-16188	** TOTAL PTE (tons/year)	Limited TOTAL PTE (tons/year)
	Unlimited PTE	Limited*					
PM	30.3	17.7	8.34	0.81	1.90	28.75	24.8
PM10	31.3	18.3	8.34	0.89	1.98	29.51	25.45
SO2	1.10	0.64	0.0	0.01	0.01	0.66	0.57
VOC	426.65	249 (limit)	10.78	14.44	14.4	288.62	249 (limit)
CO	16	5.44	0.0	1.25	1.26	7.95	6.86
NOx	18.6	10.85	0.0	1.49	1.5	13.84	11.90
HAPs	133	77.6	0.30	5.88	5.98	89.76	77.4

\* - Since the VOC is limited to less than 250 tons/yr, the rest of the pollutants will follow:  
 \*\* - Limited PTE in Part 70 08707182 + SSM 087-12244 PTE + MSM 087-14331 PTE + MSM 087-16188 PTE  
 Limited Total PTE, tons/yr = VOC limit /Unlimited Total PTE for VOC \* Pollutant Unlimited Total PTE

This source is an existing minor stationary source because the source kept the limit of less than 250 tons of volatile organic compounds (VOC) per year, an attainment criteria pollutant in each Source Modification issued, and it is not one of the 28 listed source categories.

**Potential to Emit After Issuance of the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Modification (surface coating line and extruder)	0.14	0.22	0.01	14.74	1.26	1.5	5.92
PSD Threshold	250	250	250	250	250	250	-
Existing Source	24.80	25.45	0.57	249	6.86	11.90	77.40
Total Source Emissions	24.94	25.67	0.58	249 *	8.12	13.40	83.32

\* - The source wants to keep the limit of 249 tons per year of VOC to stay a minor source for PSD.

- (a) This modification to an existing minor stationary source is not major because no pollutant is emitted at PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The total source emissions after these modifications (MSM 087-18586-00031 & SPM 087-18821-00031) would result to more than 250 tons per year, however, the source requested to keep the 249 tons of VOC limit in order to stay a minor source for PSD.

**County Attainment Status**

The source is located in LaGrange County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (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. LaGrange County has been designated as attainment or unclassifiable for ozone.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

**State Rule Applicability - Entire Source**

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration)  
 This modification is not subject to 326 IAC 2-2, as no criteria pollutants are emitted at 250 tons per year, PSD threshold.
- (b) 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:

- (1) 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.
- (2) 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.

### State Rule Applicability - Individual Facilities

- (a) 326 IAC 8 (Sources of Volatile Organic Compounds)  
This modification is not subject to any of the rules in article 326 IAC 8, as it does not fit any of the sources listed in the rule.
- (b) 326 IAC 8-1-6 (General Reduction Requirements)  
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year or greater, located anywhere in the state, which are otherwise regulated by other provisions of this article 326 IAC 8.

The SDM EA extrusion line, identified as emission unit X-014, which includes the hot air rubber curing operation and spray line, identified as X-037 are not subject to 326 IAC 8-1-6, as each line does not have potential VOC emissions of 25 tons per year.

- (c) 326 IAC 2-4.1-1 (New Source Toxic Control)  
This rule does not apply to the SDM EA extrusion line, identified as emission unit X-014 and spray line, identified as X-037 as they do not emit HAPs at major levels.
- (d) 326 IAC 6-3-2 (Process Operations)
  - (1) The spray line, identified as X-037 shall be considered in compliance with this rule if using either dry filters, waterwash, or an equivalent control ; and the owner or operator shall operate the control device in accordance with the manufacturer's specifications.  
  
This spray line, identified as X-037 is in compliance with this rule as it is controlled with dry filters, and it will be in operation at all times in accordance with the manufacturer's specifications.
  - (2) SDM EA extrusion line, identified as emission unit X-014, is exempted from 326 IAC 6-3-2, as it emits PM less than 0.551 pounds per hour.

### Changes to the Part 70

Note: Additions to the Part 70 will be **bolded** and deletions are ~~struck through~~ for emphasis.

- (1) *Item (z), now (y) of Section A.2 of the Part 70 will be deleted and replaced by the new SDM EA extrusion line X-014:*
  - (z) ~~One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as GE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven ex-~~

~~hausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.~~

- (y) **One (1) SDM EA extrusion line, identified as emission unit X-014, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour (mmBtu/hour) each, exhausting to vents PEV-B7 and PEV-B8, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 mmBtu/hr each, exhausting to vents PEF-B7 and PEF-B3, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 mmBtu/hr each, and exhausting to vent PEF-B9.**
- (2) *An application was submitted to delete seven (7) CV finishing touchup stations, however, the permit (Significant Permit Modification 087-16667-00031) was issued but these touchup stations were left out in the permit.*
- (g) ~~Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.~~
- (h g) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i h) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j i) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (k j) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (l k) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m l) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume, low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n m) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o n) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.

- (p o) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (q p) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (r q) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (s r) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t s) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u t) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (v u) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (w v) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per

hour.

- (x-w) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (y x) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (z y) **One (1) SDM EA extrusion line, identified as emission unit X-014, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour (mmBtu/hour) each, exhausting to vents PEV-B7 and PEV-B8, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 mmBtu/hr each, exhausting to vents PEF-B7 and PEF-B3, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 mmBtu/hr each, and exhausting to vent PEF-B9. One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven exhausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.**
- (aa z) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (bb aa) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units

per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

- (~~cc~~ **bb**) One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per hour and 4.8 pounds of talc per hour.
- (~~dd~~ **cc**) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.
- (~~ee~~ **dd**) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (~~ff~~ **ee**) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.
- (~~gg~~ **ff**) One (1) surface coating line, identified as ~~X-033~~ **X-003**, including:
- (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
  - (2) one (1) electric curing oven.
- (~~hh~~ **gg**) One (1) SDM EE extrusion line, identified as emission unit X-035, with a capacity of 1,289 pounds of rubber per hour, including:
- (1) Two (2) natural gas-fired microwave curing ovens, exhausting to vents PEV-E3 and PEV-E4, capacity: 0.143 million British thermal unit per hour, each.
  - (2) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to stacks PEF-E7 and PEF-E8, capacity: 0.850 million British thermal unit per hour, each.
  - (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.
- (~~ii~~ **hh**) One (1) spray line, identified as X-036, equipped with six (6) high volume, low pressure

(HVLP) spray guns, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, capacity: 10 grams per minute of coating per gun.

- (ii) **One (1) spray line, identified as X-037, equipped with six (6) high volume low pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 mmBtu/hr each and exhausting to stacks PEF-B11 and PEF-B12.**

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (g) ~~Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.~~
- (h g) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i h) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j i) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (k j) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.

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

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

- († k) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- († l) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume, low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- († m) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- († n) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- († o) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (ee) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.
- (gg ff) One (1) surface coating line, identified as ~~X-033~~ **X-003**, including:
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
  - (2) one (1) electric curing oven.
- († hh) One (1) spray line, identified as X-036, equipped with six (6) high volume, low pressure (HVLP) spray guns, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, capacity: 10 grams per minute of coating per gun.
- (ii) **One (1) spray line, identified as X-037, equipped with six (6) high volume low pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 mmBtu/hr each and exhausting to stacks PEF-B11 and PEF-B12.**

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

2. Condition D.1.1 will be amended to delete one of the limits, as it conflicts with the other VOC limit established. Condition D.1.1(c), specified all the emission units in Section D.1 be limited to 183 tons/year pursuant to the BACT limit, and D.1.1(d) as stated in the condition also limits all emission units in Section D.1 to 161 tons/year.

If 183 tons per year is combined with the extrusion process with 83.6 tons/year PTE, 1.90 tons/year PTE from mixing and milling, 2.0 tons/year PTE from insignificant activities, and 1.08 tons/year, the total limited PTE would be 271.58 tons per year, exceeding 250 tons/year (PSD threshold).

If 161 tons/year is combined with the extrusion process with 83.6 tons/year PTE, 1.90 tons/year

PTE from mixing and milling, 2.0 tons/year PTE from insignificant activities, and 1.08 tons/year, the total limited PTE would be 249.58 tons per year, less than 250 tons/year.

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

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- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to that emission unit.
- (b) Any change or modification at the spray booths (Lines 2, 3, 5 and 6), two (2) CV finishing touchup stations (X004), urethane application lines (X020, X021, X023), the portable spray booth or the three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) that increases the potential to emit VOC at the facility to twenty-five (25) tons per year or more may cause the source to become subject to 326 IAC 8-1-6 and prior approval is required.
- (c) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the ~~seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019)~~ shall be as follows:
- (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), ~~nine two (9 2) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth, and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-033 003), and two (2) spray lines (X-034 and X-036), and one (1) spray line, identified as X-037~~ shall be limited to less than ~~483~~ **161** tons per consecutive twelve (12) month period. ~~This is the BACT limit for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019).~~ **This 161 tons per year VOC limitation, in combination with the VOC emissions of 83.6 tons per year from extruding and curing, 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.08 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. This limit shall also satisfy the BACT requirements, pursuant to 326 IAC 8-1-6.**
  - (2) All coating, urethane and silicone application devices at these facilities or shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
  - (3) All VOC containing containers shall be kept covered when not in use.
- ~~(d) The VOC usage at the total of all facilities in this section, excluding combustion, shall be limited to less than 161 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This VOC limitation, in combination with potential VOC emissions of 83.6 tons per year from extruding and curing, 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.08 tons per year from combustion, will limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.~~
- (d) Any change or modification which may increase the VOC potential emissions from spray line, X-034 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change

may occur.

- (e) Any change or modification which may increase the VOC potential emissions from spray line, X-036 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.
- (f) **Any change or modification which may increase the VOC potential emissions from spray line, X-037 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.**

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

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- (a) The PM from the one (1) spray coating line (X025), one (1) surface coating line (X-033), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth, three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) and spray line X-034 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:

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

$$P = \text{process weight rate in tons per hour}$$

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

$$P = \text{process weight rate in tons per hour}$$

- (b) **Pursuant to 326 IAC 6-3-2 (Process Operations), the spray line, identified as X-037 shall be considered in compliance with this rule using either dry filters, waterwash, or an equivalent control; and the owner or operator shall operate the control device in accordance with the manufacturer's specifications.**

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

- (¶ p) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (¶ q) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (¶ r) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (¶ s) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (¶ t) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (¶ u) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.

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

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

- (~~w~~ v) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (~~x~~ w) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (~~y~~ x) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (~~z~~-y) **One (1) SDM EA extrusion line, identified as emission unit X-014, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour (mmBtu/hour) each, exhausting to vents PEV-B7 and PEV-B8, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 mmBtu/hr each, exhausting to vents PEF-B7 and PEF-B3, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 mmBtu/hr each, and exhausting to vent PEF-B9.**
- (~~aa~~ z) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (~~bb~~ aa) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

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

(~~ee~~ **dd**) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.

(~~hh~~ **gg**) One (1) SDM EE extrusion line, identified as emission unit X-035, with a capacity of 1,289 pounds of rubber per hour, including:

- (1) Two (2) natural gas-fired microwave curing ovens, exhausting to vents PEV-E3 and PEV-E4, capacity: 0.143 million British thermal unit per hour, each.
- (2) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to stacks PEF-E7 and PEF-E8, capacity: 0.850 million British thermal unit per hour, each.
- (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.

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

**D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]**

SDM EA Extrusion Line, identified as emission unit X-014, which includes hot air rubber curing operation is not subject to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), as its potential VOC emission is less than 25 tons per year. Any change or modification from this line that would increase each potential VOC emissions to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

**D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]**

SDM EA Extrusion Line, identified as emission unit X-014, which includes hot air rubber curing operation is not subject to 326 IAC 2-4.1-1 (New Source Toxic Control), as its HAPs PTEs are less than the major levels. Any change or modification from this line that would increase the single HAP PTE to 10 tons per year and combined HAPs PTE to 25.0 tons per year or greater shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1 before such change may occur.

**Compliance Determination Requirements**

**D.2. ~~2~~ 4 Particulate Matter (PM)**

The fabric filters (CE-03 and CE-04) for PM control shall be in operation and control emissions from the all facilities listed in this section as exhausting to that filter at all times that the facilities are in operation.

### SECTION D.3

### FACILITY CONDITIONS

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

~~(ee)~~ **bb)** One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per hour and 4.8 pounds of talc per hour.

~~(dd)~~ **cc)** One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**AIR COMPLIANCE BRANCH**  
**Part 70 Quarterly Report**

Source Name: Nishikawa Standard Company  
 Source Address: 324 Morrow Street, Topeka, Indiana 46571  
 Mailing Address: 324 Morrow Street, Topeka, Indiana 46571  
 Part 70 Permit No.: T 087-7182-00031  
 Facilities: Spray coating line (X025), spray booths (Lines 2, 3, 5 and 6), silicone application lines (X001 and X019), ~~nine (9)~~ **two (2)** CV finishing touchup stations (~~X003 and X004~~), urethane application lines (X020, X021, X023), portable spray booth, three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (~~X-033-003~~), and two (2) spray lines (X-034 and X-036), **and one (1) spray line, identified as X-037**  
 Parameter: Total VOC usage  
 Limit: Less than 161 tons per consecutive twelve (12) month period  
 Quarter: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
1			
2			
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.

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.

### **Conclusion**

The operation of this automotive rubber weather stripping shall be subject to the conditions of the attached **Minor Source Modification 087-18586-00031** and **Minor Permit Modification 087-18821-00031**.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name: Nishikawa Standard Company**  
**Address City IN Zip: 324 Morrow St., Topeka, IN 46671**  
**Permit Number: 087-18586**  
**Plt ID: 087-00031**  
**Reviewer: Aida De Guzman**  
**Date: 25-Feb-04**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	2 each 0.143 mmBtu/hr curing ovens 2 each 0.85 mmBtu/hr rubber curing ovens 2 each 0.375 mmBtu/hr wire metal sys. Burners 2 each 0.34 mmBtu/hr coating cure ovens
3.4	30.0	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.5	0.1	1.3

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 \*\*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  
 See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name: Nishikawa Standard Company**  
**Address City IN Zip: 324 Morrow St., Topeka, IN 46671**  
**Permit Number: 087-18586**  
**Pit ID: 087-00031**  
**Reviewer: Aida De Guzman**  
**Date: 25-Feb-04**

2 each 0.143 mmBtu/hr curing ovens  
 2 each 0.85 mmBtu/hr rubber curing ovens  
 2 each 0.375 mmBtu/hr wire metal sys. Burr  
 2 each 0.34 mmBtu/hr coating cure ovens

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.146E-05	1.798E-05	1.123E-03	2.696E-02	5.093E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.490E-06	1.648E-05	2.097E-05	5.692E-06	3.146E-05

Methodology is the same as page 1.

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Nishikawa Standard Company  
**Address City IN Zip:** 324 Morrow St., Topeka, IN 46671  
**Permit Number:** 087-18586  
**Plt ID:** 087-00031  
**Reviewer:** Aida De Guzman  
**Date:** Feb. 25, 2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Spray Capacity/Gun (grams/min)	Number of Guns	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)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Surface Coating Line X-037 TW-017B	8.6	9.90%	0.0%	9.9%	0.0%	19.80%	10.00000	6.000	0.85	0.85	0.79	18.84	3.44	10.95	0.11	4.30	65%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>0.79</b>	<b>18.84</b>	<b>3.44</b>	<b>10.95</b>	<b>0.11</b>
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Note: The substrate is a 2-inch wide rubber which can be hundreds of feet in length, using HVLP spray system. Overspray is controlled by dry filters with 99% efficiency.

**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 = spray capacity, grams/min \* no. of guns \* lb/454 grams \* 60 min/hr \* %VOC

Potential VOC Pounds per Day = spray capacity, grams/min \* no. of guns \* lb/454 grams \* 60 min/hr \* 24 \* %VOC

Potential VOC Tons per Year = spray capacity, grams/min \* no. of guns \* lb/454 grams \* 60 min/hr \* 24 \* 365/2000 \* %VOC

Particulate Potential Tons per Year = spray capacity, grams/min \* no. of guns \* lb/454 \* 60 min/hr \* (1-VOC % by Wt) \* (1-efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

VOC and Particulate

From Surface Coating Operations

**Company Name:** Nishikawa Standard Company  
**Address City IN Zip:** 324 Morrow St., Topeka, IN 46671  
**Permit Number:** 087-18586  
**Plt ID:** 087-00031  
**Reviewer:** Aida De Guzman  
**Date:** Feb. 25, 2004

Material	Density (Lb/Gal)	Spray Capacity Per Gun (grams/min)	Maximum No. of Guns	Weight % Ethylene Glycol	Ethylene Glycol Emissions (tn/yr)
<b>Surface Coating Line X-037</b>					
TW017B	8.6	10.00	6.00000	0.006	0.21

<b>Rubber Extrusion (Compound #8 -EPDM 1 (EPDM Sulfur Cure))</b>							
	Rubber Throughput (Lb/hr)	VOC Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	Combined HAPs Emission Factor (lb/lb rubber)	Combined HAPs Emissions (tons/yr)	PM Emission Factor (lb/lb rubber)	PM Emissions (tons/yr)
Extruder	1289.0	3.900E-05	0.22	2.990E-05	0.17	2.67E-08	1.51E-04
Hot Air Curing	1289.0	1.900E-03	11	9.760E-04	5.51	n/a	n/a

METHODOLOGY

Surface Coating HAPS emission rate (tons/yr) = Spray capacity per gun, grams/min \* no. of guns \* lb/454 grams \* 60 min/hr \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Extruder VOC/HAP/PM (tons/yr) = throughput, lb/hr \* Ef, lb/lb \* 8760 hrs/yr \* ton/2000 lbs

Hot Air Curing VOC/HAP (tons/yr) = throughput, lb/hr \* Ef, lb/lb \* 8760 hrs/yr \* ton/2000 lbs