



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 6, 2004

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

TO: Interested Parties / Applicant

RE: Freudenberg - NOK General Partnership / 143-18747-00010

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



Joseph E. Bertoni
Governor

Lori F. Kaplan
Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
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April 6, 2004

Mr. Tom Julian
Freudenberg - NOK General Partnership
821 South Lake Road
Scottsburg, Indiana 47170

Re: AA143-18747-00010
Second Administrative Amendment to
Part 70 143-8936-00010

Dear Mr. Julian:

Freudenberg-NOK General Partnership was issued a Title V permit on February 21, 2001 for a stationary rubber and spring packed seals manufacturing plant. A letter requesting a change was received on February 20, 2004. The source proposes to install nineteen (19) rubber presses, which will emit 6.95 tons of VOC per year combined (see the attached spreadsheet). Pursuant to the provisions of 2-7-11(a)(7), the change qualifies as a "revision in descriptive information where revision will not trigger a new applicable requirement or violate a permit term", since the VOC emissions are less than the Minor Source Modification threshold of ten (10) tons per year.

Although this modification does not have an applicable requirements, the source has all insignificant activities listed in Section A.3. In addition, the source has removed some presses since the issuance of the Part 70 Permit, 143-8936-00010. The total number of rubber presses located at the source is now one hundred and forty-five (145). Therefore Section A.3, Insignificant Activities, shall be modified as follows:

A.3 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) ~~One hundred and thirty-seven (137)~~ **One hundred and forty-five (145)** miscellaneous compression/transfer rubber molding presses, each emitting four (4) pounds per day of a single HAP;
- (b) Five (5) extruders, each emitting four (4) pounds per day of a single HAP;
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
 - (1) One (1) natural gas fired HVAC unit, with a maximum rating of 0.5 million British thermal units (MMBtu) per hour;
 - (2) Six (6) natural gas fired space heaters, each with a maximum rating of 0.4 MMBtu per hour.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (g) Three (3) phosphating tanks, each with a capacity of one hundred (100) gallons, used for cleaning, rinsing, and phosphatizing metal inserts. Note: These tanks do not contain any VOC or HAPs;
- (h) Closed loop heating and cooling systems;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (k) Heat exchanger cleaning and repair;
- (l) Process vessel degassing and cleaning to prepare for internal repairs;
- (m) Paved and unpaved roads and parking lots with public access;
- (n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. These operations are subject to 326 IAC 6-3-2.
- (r) Filter or coalescer media change-out.
- (s) A laboratory as defined in 326 IAC 2-7-1(20)C.
- (t) Four (4) adhesive drum machines, each with a maximum capacity of coating 10,300 metal parts per hour. Actual VOC emissions are less than 15 pounds per day for each machine, rendering 326 IAC 8-2-9 as not applicable.
- (u) Six (6) plastic injection molding machines.
- (v) The use of mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilo Pascals measured at thirty-eight (38) degrees Centigrade).
- (w) One (1) detergent parts washer, using no organic solvents and emitting no VOC or HAP.
- (x) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months and are not subject to 326 IAC 20-6. These operations utilize one (1) cold cleaner degreaser, which is subject to 326 IAC 8-3-2.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, extension 3284, or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

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

Attachments
LQ/EVP

cc: File - Scott County
U.S. EPA, Region V
Scott County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Freudenberg - NOK General Partnership
(Scottsburg I)
821 South Lake Road
Scottsburg, Indiana 47170**

(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.

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

Operation Permit No.: T143-8936-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 21, 2001 Expiration Date: February 21, 2006
First Minor Source Modification 143-12867-00010	Issuance Date: January 12, 2001
First Minor Permit Modification 143-14699-00010	Issuance Date: September 5, 2001
First Administrative Amendment 143-15391-00010	Issuance Date: January 18, 2002
Second Administrative Amendment 143-18747-00010	Page Amended: 5
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 6, 2004

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.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this 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 rubber and spring packed seals manufacturing plant.

Responsible Official:	Tom Julian
Source Address:	821 South Lake Road, Scottsburg, IN 47170
Mailing Address:	821 South Lake Road, Scottsburg, IN 47170
SIC Code:	3053
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

- (a) Two (2) rubber post-cure ovens, identified as RC2 and RC3, constructed in February 1994, each with a maximum capacity of processing two hundred and forty (240) pounds of rubber per hour, using no control, and exhausting to stacks RC2 and RC3, respectively;
- (b) One (1) rubber mixer, identified as MIX1, constructed in February 1994, with a maximum capacity of processing 1,180 pounds of raw material per hour, with one (1) baghouse for particulate matter control, and exhausting to stack MIX1;
- (c) One (1) Banbury rubber mixer, identified as MIX2, with a maximum capacity of processing 2000 pounds of raw material per hour, using no control, and exhausting to the atmosphere;
- (d) One (1) Mariyama rubber mixer, identified as MIX3, with a maximum capacity of processing 360 pounds of raw material per hour, using no control, and exhausting to the atmosphere;

A.3 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) One hundred and forty-five (145) miscellaneous compression/transfer rubber molding presses, each emitting four (4) pounds per day of a single HAP;
- (b) Five (5) extruders, each emitting four (4) pounds per day of a single HAP;

**Appendix A: Emissions Calculations
VOC and HAP
From Rubber Presses**

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 821 South Lake Road, Scottsburg, Indiana 47170
AA: 143-18747-00010
Pit ID: 143-00010
Reviewer: Linda Quigley/EVP
Date: March 10, 2004

Emission Units (Insignificant Activities)	Maximum Throughput Rubber (lb/hr)	Potential Emissions (lb/hr)			Potential Operating Hours	Potential Emissions (tpy)		
		VOC	Total HAP	Carbon Disulfide		VOC	Total HAP	Carbon Disulfide
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
110 ton Engel	8.77	5.87E-02	1.19E-02	1.16E-02	8760.0	2.57E-01	5.21E-02	5.08E-02
110 ton Engel	8.77	5.87E-02	1.19E-02	1.16E-02	8760.0	2.57E-01	5.21E-02	5.08E-02
110 ton Engel	8.77	5.87E-02	1.19E-02	1.16E-02	8760.0	2.57E-01	5.21E-02	5.08E-02
968-160F Desma - Pin Boots	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma - Pin Boots	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma - Pin Boots	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
968-160F Desma - Pin Boots	13.17	8.81E-02	1.79E-02	1.74E-02	8760.0	3.86E-01	7.84E-02	7.62E-02
Potential Emissions		1.59	0.32	0.31		6.95	1.41	1.37

METHODOLOGY

This table represents a summary of the potential to emit of VOC and HAPs. A complete listing of VOC and HAP emission factors can be found in AP-42, Section 4.12, Manufacture of Rubber Products, June 1999 (draft). Carbon Disulfide is the largest single HAP emitted.