



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 9, 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: Nishikawa Standard Company / 087-19170-00031

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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September 9, 2004

Mr. Dennis Potts
Nishikawa Standard Company
324 Morrow Street
Topeka, IN 46571

Re: **087-19170**
Second Significant Permit Modification to
Part 70 No.: T 087-7182-00031

Dear Mr. Potts:

Nishikawa Standard Company was issued a permit on April 12, 2001 for a rubber seals manufacturing source. A letter requesting changes to this permit was received on May 13, 2004. 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 adding two (2) additional surface coating lines and one (1) additional CV extrusion line to the existing plant. In order to remain a minor source pursuant to 326 IAC 2-2, PSD, the VOC limits in the permit have been revised due to this change.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments
CAP/MES

cc: File - LaGrange County
U.S. EPA, Region V
LaGrange County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



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Lori F. Kaplan
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

(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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 087-7182-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 12, 2001 Expiration Date: April 12, 2006

First Minor Permit Modification No.: 087-14376-00031, issued on July 20, 2001
 First Administrative Amendment No.: 087-15216-00031, issued on January 24, 2002
 First Significant Permit Modification No.: 087-16667-00031, issued on January 15, 2003
 Second Minor Permit Modification No.: 087-18821-00031, issued on June 24, 2004

Second Significant Permit Modification No.: 087-19170-00031	Affected Pages: 2, 3, 5 through 9a, 30, 31, 32, 32a 35, 36, 37, 48 Pages Added: 21a, 32b, 37a
Issued by: Original Signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: September 9, 2004

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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.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)]

The Permittee owns and operates a stationary extruded rubber seals manufacturing source.

Responsible Official:	Mr. Mark Griffin
Source Address:	324 Morrow Street, Topeka, Indiana 46571
Mailing Address:	324 Morrow Street, Topeka, Indiana 46571
Phone Number:	(219) 593-2156
SIC Code:	3061
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; 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) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.

- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (y) One (1) SDME 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.

- (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.
- (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.
- (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.
- (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.
- (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.
- (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.

- (ff) One (1) surface coating line, identified as 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.
- (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.
- (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.
- (jj) One (1) CV extrusion line, identified as X-038, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Four (4) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
- (kk) One (1) spray line, identified as X-039, equipped with four (4) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (ll) One (1) spray line, identified as X-040, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (mm) One (1) infrared cure oven at spray lines X-039 and X-040, exhausting to Stack PEF-A31.

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

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

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) CV Annealing Oven [326 IAC 6-3]
- (m) Silicone Coating Mixing Station [326 IAC 6-3]
- (n) Die Room Metalworking Equipment [326 IAC 6-3]
- (o) SDM Mezzanine Units [326 IAC 6-3]

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (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.
- (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.
- (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.

(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)

- (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.
- (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.
- (ff) One (1) surface coating line, identified as 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.
- (kk) One (1) spray line, identified as X-039, equipped with four (4) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, 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)

- (ll) One (1) spray line, identified as X-040, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (mm) One (1) infrared cure oven at spray lines X-039 and X-040, exhausting to Stack PEF-A31.

(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][326 IAC 2-2]

- (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 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), two (2) CV finishing touchup stations (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), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, and two (2) spray lines (X-039 and X-040) shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. This 148 tons per year VOC limitation, in combination with the VOC emissions of 96.47 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 1.12 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) 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.
- (g) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-039 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.
- (h) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-040 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, each individual hazardous air pollutant (HAP) delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the amount of that HAP recovered, shall be limited to less than ten (10) tons per consecutive twelve (12) month period.
- (b) Pursuant to CP 087-9388-00031, issued on January 28, 1999, any combination of HAPs delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the total HAPs recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

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

- (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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = 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:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = 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.

D.1.4 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 all control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEV-A27, PEV-A28, PEV-A29, PEV-A30, PEF-A14 and PEF-E3) while one (1) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

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)

- (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.
- (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.
- (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.
- (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.
- (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.

(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)

- (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.
- (bb) 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.
- (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.
- (gg) One (1) SDME 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.
- (jj) One (1) CV extrusion line, identified as X-038, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
- (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Four (4) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X005) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X006) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE SECTION
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), two (2) CV finishing touchup stations (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 (X003), and five (5) spray lines (X-034, X-036, X-037, X-039 and X-040)
 Parameter: Total VOC usage
 Limit: No more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month

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.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Nishikawa Standard Company
Source Location:	324 Morrow Street, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3061
Operation Permit No.:	T 087-7182-00031
Operation Permit Issuance Date:	April 12, 2001
Significant Permit Modification No.:	087-19170-00031
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a modification application from Nishikawa Standard Company relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) CV extrusion line, identified as X-038, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Four (4) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
- (b) One (1) spray line, identified as X-039, equipped with four (4) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (c) One (1) spray line, identified as X-040, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (d) One (1) infrared cure oven at spray lines X-039 and X-040, exhausting to Stack PEF-A31.

History

On May 13, 2004, Nishikawa Standard Company submitted an application to the OAQ requesting to add two (2) additional surface coating lines and one (1) additional CV extrusion line to their existing plant. Nishikawa Standard Company was issued a Part 70 permit on April 12, 2001. That Part 70 permit incorporated the changes approved under the First Minor Source Modification 087-11820, issued on March 15, 2000, and the First Significant Source Modification 087-12244, issued on July 19, 2000. A Second Minor Source Modification, 087-14331, was issued on July 24, 2001, and was incorporated into the Part 70 permit in the First Minor Permit Modification 087-14376, issued on July 20, 2001. Significant Source Modification 16188 was issued on November 27, 2002, and was incorporated into the permit by First Significant Permit Modification 087-16667, issued on January 15, 2003. Minor Source Modification 087-18586 was issued on June 4, 2004, and incorporated into the permit by Second Minor Permit Modification 087-18821, issued on June 24, 2004. An Administrative Amendment, 087-15216, was issued on January 24, 2002.

Enforcement Issue

There are no air quality enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
PEF-A11	Microwave Curing Ovens	35.0	1.00	1,500	482
PEF-A12	Hot Air Rubber Curing Ovens	35.0	1.00	2,000	482
PEF-A13	Plasma Arc Generator	35.0	1.00	1,000	Ambient
PEF-A14	Spray Lines X-039 and X-040	35.0	1.33	unknown	unknown
PEF-A31	Infrared Cure Oven	35.0	1.00	2,000	260

Recommendation

The staff recommends to the Commissioner that the Part 70 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 May 13, 2004. Additional information was received on May 28, 2004.

Emission Calculations

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

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. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.15
PM ₁₀	4.20
SO ₂	0.006
VOC	6.84
CO	0.773
NO _x	0.920

HAPs	Potential To Emit (tons/year)
Worst Case Individual (Acetophenone)	0.700
TOTAL	3.39

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Permit Modification. Since the unrestricted potential to emit PM and PM₁₀ from the proposed modification is less than 5.00 tons per year, the unrestricted potential to emit SO₂, NO_x, and VOC is less than 10.0 tons per year, and the unrestricted potential to emit CO is less than 25.0 tons per year, this modification does not require a minor or significant source modification pursuant to 326 IAC 2-7-10.5. In addition, the modification is not subject to the requirements of 326 IAC 2-2, because even without restrictions, the potential emissions do not meet or exceed the thresholds for a major modification under 326 IAC 2-2. Thus, no construction approval is required. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1), because the modification will change a case-by-case determination of an emission limitation or standard. The Significant Permit Modification will give the source approval to operate the proposed facilities.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) LaGrange County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	35.8
PM ₁₀	36.5
SO ₂	0.58
VOC	< 250
CO	8.12
NO _x	13.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for MPM 087-18821, issued on June 24, 2004. The potential to emit VOC is limited to less than 250 tons per year in the permit.

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.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	4.15	4.20	0.006	6.84	0.773	0.920	3.39
Entire Source prior to Modification	35.8	36.5	0.58	< 250	8.12	13.4	83.3
Entire Source after Modification	40.0	40.7	0.586	< 250	8.89	14.3	86.7
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) Another modification was recently permitted in MSM 087-18586 and MPM 087-18821. That modification had the potential to emit 0.14 ton per year of PM, 0.22 ton per year of PM₁₀, 0.01 ton per year of SO₂, 14.74 tons per year of VOC, 1.26 tons per year of CO, and 1.5 tons per year of NO_x. Those emissions, in combination with the potential to emit from this proposed modification are also below the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to the combination of the two (2) modifications.
- (c) In order to remain a minor source pursuant to 326 IAC 2-2, PSD, the applicant has requested that the potential to emit VOC from the entire source still be limited to less than 250 tons per year. The limitation existing in the permit limits VOC usage at the total of all coating operations to less than 161 tons per year. This is based on maximum potential VOC emissions from other processes as follows:

Extruding and curing: 83.6 tons per year
 Mixing and milling: 1.90 tons per year
 Insignificant activities: 2.0 tons per year
 Combustion 1.08 tons per year

That limitation was created in SPM 087-16667, issued on January 15, 2003. In order to evaluate whether the limitation must be adjusted so that the source remains a minor source pursuant to 326 IAC 2-2, the potential VOC emissions from the extruding and curing, mixing and milling, insignificant activities and combustion have been re-evaluated as follows:

	Extruding and Curing	Mixing and Milling	Insignificant Activities	Combustion
T 087-18586-00031, including MSM 087-11820 and SSM 087-12244	61.6	1.90	2.00	0.911
MSM 087-14331 and MPM 087-14376	10.92	-	-	0.08
SSM 087-16188 and SPM 087-16667	11.0	-	-	0.082
MSM 087-18586 and MPM 087-18821	6.58 (net difference of new X-014 and removed X-014)	-	-	-0.006 (net difference of new units and removed units)
AA 087-15216	-	-	-	-
This modification	6.37	-	-	0.051
Total	96.47	1.90	2.00	1.12

Based on this analysis, the limited potential to emit VOC from the coating operations must allow for the following:

Extruding and curing: 96.47 tons per year
 Mixing and milling: 1.90 tons per year
 Insignificant activities: 2.00 tons per year
 Combustion: 1.12 tons per year
 Total: 101.49 tons per year

Therefore, the VOC usage at the total of all coating operations must be limited to no more than 148 tons per year. This will limit the potential to emit VOC from the entire source to less than 250 tons per year, and this source will remain a minor source pursuant to 326 IAC 2-2, PSD.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1.
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for any pollutant;
 - (2) that is subject to an emission limitation or standard for that pollutant; and
 - (1) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 21, and 40 CFR Parts 61 and 63) applicable to this modification.

State Rule Applicability - Individual Facilities

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

This source is a minor source pursuant to 326 IAC 2-2, PSD. See the section entitled, "Potential to Emit of Modification After Issuance," for a discussion of the applicability of 326 IAC 2-2.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) The potential VOC emissions from the new coating lines are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The potential VOC emissions from the new extrusion line are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This source has a valid permit pursuant to 326 IAC 2-7. Therefore, the surface coating is exempt from the requirements of 326 IAC 6-3-2(d)(2). The two (2) spray lines (X-039 and X-040) are equipped with dry filters.
- (b) The potential particulate emissions from the one (1) CV extrusion line are less than 0.551 tons per year. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the CV extrusion line is exempt from the requirements of 326 IAC 6-3.

Compliance Requirements

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

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

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

- (a) The two (2) spray lines (X-039 and X-040) have applicable compliance monitoring conditions as specified below: list conditions

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEF-A14) while one (1) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

- (b) There are no monitoring conditions specifically applicable to the one (1) CV extrusion line (X-038).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

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

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

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting

- to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
 - (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
 - (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
 - (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.
 - (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.
 - (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.
 - (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.
 - (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.

- (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.
- (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.

- (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.
- (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.
- (y) One (1) SDME A 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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (ff) One (1) surface coating line, identified as 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.
- (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.
- (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.

- (jj) One (1) CV extrusion line, identified as X-038, with a maximum capacity of 750 pounds of rubber per hour, consisting of:**
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.**
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.**
 - (3) Four (4) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.**
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.**
- (kk) One (1) spray line, identified as X-039, equipped with four (4) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.**
- (ll) One (1) spray line, identified as X-040, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.**
- (mm) One (1) infrared cure oven at spray lines X-039 and X-040, exhausting to Stack PEF-A31.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (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.
- (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.
- (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.

(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)

- (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.
- (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.
- (ff) One (1) surface coating line, identified as 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.
- (kk) One (1) spray line, identified as X-039, equipped with four (4) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, 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)

(II) **One (1) spray line, identified as X-040, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.**

(mm) **One (1) infrared cure oven at spray lines X-039 and X-040, exhausting to Stack PEF-A31.**

(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][326 IAC 2-2]

- (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 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), two (2) CV finishing touchup stations (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), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), and one (1) spray line, identified as X-037, **and two (2) spray lines (X-039 and X-040)** shall be limited to ~~less~~ **no more than 148** tons per consecutive twelve (12) month period, **with compliance determined at the end of each month.** This ~~148~~ **96.47** tons per year VOC limitation, in combination with the VOC emissions of ~~83.6~~ **96.47** 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 ~~4.08~~ **1.12** 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) 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.
- (g) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-039 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.**
- (h) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-040 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.**

D.1.7 Particulate Matter (PM) [326 IAC 6-3-2(d)]

~~The dry filters for PM control shall be in operation at all times when the spray booths exhausting to those dry filters are in operation.~~ Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEV-A27, PEV-A28, PEV-A29, PEV-A30, **PEF-A14** and PEF-E3) while one (1) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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)

- (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.
- (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.
- (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.
- (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.
- (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.

(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)

- (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.
- (bb) 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.
- (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.
- (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.)

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

- (jj) **One (1) CV extrusion line, identified as X-038, with a maximum capacity of 750 pounds of rubber per hour, consisting of:**
- (1) **Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.**
 - (2) **Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.**
 - (3) **Four (4) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.**
 - (4) **One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.**

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

The facilities and limit listed on the Quarterly Report form on page 48 of 50 have been revised as follows:

- Facilities: Spray coating line (X025), spray booths (Lines 2, 3, 5 and 6), silicone application lines (X001 and X019), two (2) CV finishing touchup stations (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 (X003), **and five (5) two (2) spray lines (X-034, and X-036, X-037, X-039 and X-040), and one (1) spray line, identified as X-037**
- Limit: **Less No more than 464 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month**

In addition to the above mentioned changes, the US EPA and IDEM, OAQ, require that the following condition be added to all Part 70 Operating Permits:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

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

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 087-19170-00031.

**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 Street, Topeka, Indiana 46571
Permit Number: 087-19170
Plt ID: 087-00031
Reviewer: CarrieAnn Paukowits
Application Date: May 13, 2004

Two (2) microwave curing ovens (0.25 MMBtu/hr each)
 Four (4) hot air rubber curing ovens (0.40 MMBtu/hr each)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.10	18.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.017	0.070	0.006	0.920	0.051	0.773

*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 Street, Topeka, Indiana 46571
Permit Number: 087-19170
Pit ID: 087-00031
Reviewer: CarrieAnn Paukowits
Application Date: May 13, 2004

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr	1.93E-05	1.10E-05	6.90E-04	1.66E-02	3.13E-05

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total
Potential Emission in tons/yr	4.60E-06	1.01E-05	1.29E-05	3.50E-06	1.93E-05	0.017

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: Emission Calculations
Process Operations**

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Permit Number: 087-19170
Pit ID: 087-00031
Reviewer: CarrieAnn Paukowits
Application Date: May 13, 2004

Emissions from CV Extrusion Line (X-038)

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM Emission Factor (lbs/lb rubber)	PM (lbs/hr)	PM (tons/yr)	PM Control Efficiency	PM after controls (lbs/hr)	PM after controls (tons/yr)
Extruding (X038)	750	3.95E-05	0.030	0.130	2.99E-05	0.022	0.098	2.67E-08	2.00E-05	8.77E-05	0.00%	2.00E-05	8.77E-05
Hot Air Curing (X038)	750	1.90E-03	1.43	6.24	9.76E-04	0.732	3.21	N/A	N/A	N/A	N/A	N/A	N/A
		Totals:	1.45	6.37		0.754	3.30		0.000	0.00		0.000	0.000

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12
Emission factors are for Rubber Compound #8, the worst case compound at this facility.

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

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Permit Number: 087-19170
Pit ID: 087-00031
Reviewer: CarrieAnn Paukowits
Application Date: May 13, 2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Throughput (grams/min/gun)	Number of Guns	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)	Transfer Efficiency
X-039												
F-KWD	8.35	70.830%	69.8%	1.0%	10.00000	4.000	0.08	0.05	1.27	0.23	2.36	65%
X-040												
F-KWD	8.35	70.830%	69.8%	1.0%	10.00000	2.000	0.08	0.03	0.63	0.12	1.18	65%
Cleaning Agent												
Mean Green	8.51	4.100%	0.0%	4.1%	10.00000	6.000	0.35	0.02	0.39	0.07	0.58	65%

PM Control Efficiency: 95.00%

State Potential Emissions	Add worst case coating to all solvents	Uncontrolled	0.096	2.29	0.419	4.13
		Controlled	0.096	2.29	0.419	0.206
		Glycol Ethers:	0.071			

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Throughput (grams/min/gun) * Number of Guns * Weight % Organics * 60 min/hr * 1 lb/454 grams
 Potential VOC Pounds per Hour for cleaning agent = Throughput (grams/min/gun) * Number of Guns * Weight % Organics * 3 min/hr * 1 lb/454 grams (cleaning agent will not be used more than 3 minutes per hour)
 Potential VOC Pounds per Day = Potential VOC Pounds per hour * 24 hours/day
 Potential VOC Tons per Year = Potential VOC Pounds per hour x 8,760 hrs/yr x 1 ton/2,000 lbs
 Particulate Potential Tons per Year = (grams/min/gun) * Number of guns * 60 min/hr * 1 lb/454 grams * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Total = Worst Coating + Sum of all solvents used