



TO: Interested Parties / Applicant  
RE: Bauer Built, Inc. / 097-19410-00359  
FROM: Felicia A. Robinson *FL*  
Administrator  
City of Indianapolis  
Office of Environmental Services

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221  
317-327-2234  
Fax 327-2274  
TDD 327-5186  
indygov.org/dpw



October 23, 2006

David Grotjahn  
Bauer Built, Inc.  
5719 Kopetsky Drive  
Suite A-E  
Indianapolis, IN 46217

CERTIFIED MAIL: 7000 0600 0023 5187 1509

Re: 097-19410-00359  
Notice-Only Change to  
R 097-11529-00359

Dear Mr. Grotjahn:

Bauer Built, Inc. was issued a Registration on November 16, 1999 for a tire retreading facility. A letter requesting clarification of the renewal date, as well as language revisions was received on April 12, 2004. Additional information was received on February 16, 2006, and August 25, 2006.

Based upon the data submitted and the provisions in 326 IAC 2-5.5-6(d), the Registration is hereby amended as described in the enclosed Technical Support Document.

All other conditions of the Registration shall remain unchanged and in effect. For your convenience the revised registration is included.

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 Monica Doyle at (317) 327-2846.

Sincerely,

Felicia A. Robinson  
Administrator

mmd

cc: File  
Air Compliance – Matt Mosier  
Enforcement  
IDEM, OAQ – Mindy Hahn  
Marion County Health Department

**Clean air is in**

visible  
describable  
vigorating  
valuable  
credible

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Bauer Built, Inc.  
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CERTIFIED MAIL: 7000 0600 0023 5187 1509

Re: 097-19410-00359  
Notice-Only Change to R 097-11529-00359

Dear Mr. Grotjahn:

The application from Bauer Built, Inc., received on April 12, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following tire retreading facility, located at 5719 Kopetsky Drive, Suite A-E, Indianapolis, Indiana, is classified as registered:

- (a) One (1) tire buffing/grinding unit, identified as EP-1, with interlocked cyclone separator with a maximum throughput of 18.75 tires per hour.
- (b) One (1) tire cement spray booth, identified as EP-2, equipped with a low pressure high volume spray gun for finished tires and rubber tire carcass, at a maximum capacity of 16.7 tires per hour and a maximum of 0.0553 gallons per tire.
- (c) Two (2) tire curing chambers, identified as EP-3a and EP-3b.
- (d) One (1) natural gas fired boiler, identified as EP-4, rated at 2.0 million British thermal units per hour.
- (e) One (1) rim refurbishing unit, identified as EP-5, with the following equipment:
  - (1) One (1) powder coater with a low pressure high volume spray gun with filter, for refurbished rims, at a maximum capacity of 2.1 tires per hour; and
  - (2) One (1) mechanical blasting unit with an internal filter, utilizing steel shot with a blast rate of 50 rims per day.

The following conditions shall be applicable:

- A. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

Clean air is in

visible  
describable  
measurable  
valuable  
credible

Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works  
Office of Environmental Services

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indygov.org/dpw

Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

- B. Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for sources of Indirect Heating), particulate matter (PM) emissions from 2.0 million BTU/hour boiler shall be limited to 0.6 pound per million BTU heat input.
- C. Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the tire grinding line shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

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

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

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

The cyclone shall be in operation at all times the tire grinding process is in operation, in order to comply with this limit.

- D. Pursuant to the Code of Indianapolis and Marion County Chapter 511, this registration will be subject to annual operating fees.

This is a Notice-Only Change to the registration issued to this source, pursuant to 326 IAC 2-5.5-6(d)(1)(2)(6). The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204-2251**

and

**Indianapolis Office of Environmental Services  
Air Compliance  
2700 S. Belmont Avenue  
Indianapolis, IN 46221-2097**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to OAQ and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,



Felicia A. Robinson  
Administrator

mmd

cc: File  
Air Compliance - Matt Mosier  
Enforcement  
IDEM, OAQ - Mindy Hahn  
Marion County Health Department

<h2>Registration</h2>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	<b>Bauer Built, Inc.</b>
<b>Address:</b>	<b>5719 Kopetsky Drive, Suite A-E</b>
<b>City:</b>	<b>Indianapolis, IN 46217</b>
<b>Authorized individual:</b>	<b>Steven Spindler</b>
<b>Phone #:</b>	<b>(715) 672-4295</b>
<b>Registration #:</b>	<b>097-11529-00359</b>

I hereby certify that Bauer Built, Inc. is still in operation and is in compliance with the requirements of Registration 097-11529-00359.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

Technical Support Document (TSD) for a Notice-Only Change to a Registration

**Source Background and Description**

<b>Source Name:</b>	<b>Bauer Built, Inc.</b>
<b>Source Location:</b>	<b>5719 Kopetsky Drive, Suite A-E, Indianapolis, IN 46217</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>7534</b>
<b>Registration No.:</b>	<b>097-11529-00359</b>
<b>Registration Issuance Date:</b>	<b>November 16, 1999</b>
<b>Notice Only Change No.:</b>	<b>097-19410-00359</b>
<b>Permit Reviewer:</b>	<b>Monica Doyle</b>

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Bauer Built, Inc., relating to the operation of a tire retreading facility.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) tire buffing/grinding unit, identified as EP-1, with interlocked cyclone separator with a maximum throughput of 18.75 tires per hour.
- (b) One (1) tire cement spray booth, identified as EP-2, equipped with a low pressure high volume spray gun for finished tires and rubber tire carcass, at a maximum capacity of 16.7 tires per hour and a maximum of 0.0553 gallons per tire.
- (c) Two (2) tire curing chambers, identified as EP-3a and EP-3b.
- (d) One (1) natural gas fired boiler, identified as EP-4, rated at 2.0 million British thermal units per hour.
- (e) One (1) rim refurbishing unit, identified as EP-5, with the following equipment:
  - (1) One (1) powder coater with a low pressure high volume spray gun with filter, for refurbished rims, at a maximum capacity of 2.1 tires per hour; and
  - (2) One (1) mechanical blasting unit with an internal filter, utilizing steel shot with a blast rate of 50 rims per day.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

**Existing Approvals**

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

- (a) R-097-11529-00359, issued on November 16, 1999.

The following terms and conditions from previous approvals have been revised in this Registration:

The correct number of tire curing chambers was listed in the description; all references to IAPCB Regulations were removed, where they duplicated 326 IAC; the emission reporting requirement was removed; changes to IDEM, OAQ, and OES addresses were incorporated; the total throughput of tires per day was revised to match the application; and the requirement to apply for a registration renewal was removed.

#### **Justification for the Revision**

Pursuant to 326 IAC 2-5.5-6(d)(1), (2), and (6), the Registration 097-11529-00359 is being modified through a Notice-Only Change. This is not classifiable as a Registration Revision because there have been no modifications to the source, and there is no increase in actual or potential emissions. Therefore, the source is still subject to the provisions of 326 IAC 2-5.5.

#### **Air Pollution Control Justification as an Integral Part of the Process**

OES revisited the following justification the source had submitted with their initial application, such that the cyclone be considered as an integral part of the tire grinding process:

- (a) The process cannot operate without the control equipment.

The high volume of airflow and velocity necessitate the cyclone, which serves as a pneumatic conveyance device.

- (b) The control equipment serves a primary purpose other than pollution control.

The cyclone is primarily designed to remove rubber from the buffer rasp head. Failure to remove the rubber causes the buffer to clog and fail. Without the cyclone system, the build up of rubber crumb generated during the buffing operation would create unsafe conditions in and around the buffer.

- (c) The control equipment has an overwhelming positive net economic effect.

Cost analysis demonstrates that the annual operating cost for the cyclone is \$8,894, and average annual revenue is \$20,445.

OES has evaluated the justification and agreed that the cyclone will be considered as an integral part of the tire grinding process. Therefore, the permitting level will be determined using the potential to emit after the cyclone. Operating conditions in the proposed permit will specify that this cyclone shall operate at all times when the tire grinding process is in operation.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the operation 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 April 12, 2004, with additional information received on February 16, 2006, and August 25, 2006.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 5).

### Potential to Emit (of the Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency."

Pollutant	Emissions (tons/yr)
PM	4.0
PM-10	4.0
SO <sub>2</sub>	0.005
VOC	13.7
CO	0.72
NO <sub>x</sub>	0.86
Single HAP	< 1
Combination HAPs	< 1

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 25 tons per year, but greater than 5 tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-5.5.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (e) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	4.0
PM-10	4.0
SO <sub>2</sub>	0.005
VOC	13.7
CO	0.72
NO <sub>x</sub>	0.86
Single HAP	< 1
Combination HAPs	< 1

- (a) This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Registration Notice-Only Change, 097-19410-00359, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

## Federal Rule Applicability

- (a) The natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart D), due to the heat input capacity being less than 10 mmBtu/hr.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 14, 20 and 40 CFR Part 63, applicable to this source.
- (c) The National Emission Standards for Rubber Tire Manufacturing (Subpart XXXX) do not apply to this source because this source is not a major source of hazardous air pollutants.

## State Rule Applicability – Entire Source

### 326 IAC 2-2 (PSD)

This source is not a major source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the tire retreading facility will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

### 326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as Registration source, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties. However, pursuant to 326 IAC 2-6-1(b), as a permitted source in Indiana, it is subject to 326 IAC 2-6-5 (Additional Information Requests).

### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

**State Rule Applicability – Individual Facilities**

326 IAC 6-2-4(a) (Particulate Emission Limitations for sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-4(a), particulate matter (PM) emissions from the 2.0 million BTU/hour boiler shall be limited to 0.6 pound per million BTU heat input.

326 IAC 6-3-2 (Particulate)  
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the tire grinding line shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

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

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

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

The cyclone shall be in operation at all times the tire grinding process is in operation, in order to comply with this limit.

326 IAC 8-1-6 (Volatile Organic Compounds)  
Pursuant to 326 IAC 8-1-6(a), the tire buffing/grinding unit (identified as EP-1), the tire cement spray booth (identified as EP-2), the tire curing chambers (identified as EP-3a and EP-3B), and the natural gas fired boiler (identified as EP-4), are not subject to the requirements of 326 IAC 8-1-6 because they each have potential VOC emissions of less than 25 tons per year.

**Proposed Changes**

The following are corrections that have been made to Registration 097-11529-00359 pursuant to 326 IAC 2-5.5-6(g). **Bold** text indicates that the text will be added and ~~strikeouts~~ indicate that the text will be deleted.

- 1. Condition (c) has been changed to reflect the original application, which listed two tire curing chambers. The potential to emit is based upon maximum tires per day, which is determined by the tire buffing/grinding unit, identified as EP-1. Therefore, there is no increase in the potential to emit.

- (c) ~~One (1) tire autoclave curing booth, identified as EP-3.~~ **Two (2) tire curing chambers, identified at EP-3a and EP-3b.**

- 2. References to IAPCB Regulations have been stricken in the following instances, where they duplicated 326 IAC.

- A. Pursuant to ~~IAPCB Regulation 5-1-2 (Smoke and Other Visible Emissions)~~ and 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

- Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of

15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- B. Pursuant to ~~IAPCB Regulation 2 (Permits)~~ and 326 IAC 6-2-4(a) (Particular Emission Limitations for sources of Indirect Heating), particulate matter (PM) emissions for 2.0 mmBtu/hr boiler shall be limited to 0.6 pound per mmBtu heat input.
- C. Pursuant to ~~IAPCB Regulation 11-2(A)(2)~~ and 326 IAC 6-3 (Process Operations), the cyclone collector shall be in operation at all times when the tire buffing/grinding unit is in operation, and shall not exceed the allowable particulate (PM) emission rate of 0.95 pounds per hour.
3. Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement will be removed from the permit.
- ~~5. Pursuant to IAPCB Regulation 2-6 (Annual emission statement rule) and state regulation 326 IAC 2-6 (Emission Reporting), an authorized individual shall provide an annual emission statement to the Environmental Resources Management Division and the Office of Air Management at the addresses listed below no later than April 15 of each year.~~

~~Technical Support and Modeling  
Office of Air Management  
400 North Senate Avenue  
P.O. Box 6045~~

~~Indianapolis, Indiana 46206-6045~~

~~and~~

~~Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2007~~

4. Change to IDEM, OAQ and OES addresses are acknowledged and incorporated into the permit as follows:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

and

~~Environmental Resources Management Division  
Indianapolis Office of Environmental Services  
Air Quality Management Section, Compliance Data Group  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221~~

5. The emission calculations for VOC and HAPs were changed to reflect the total throughput of 450 tires per day, as was submitted in the original application. The previous calculations were incorrectly based upon 440 tires per day. This does not elevate potential to emit above the current permitting level.

6. The initial Registration No. 097-11529-00359 incorrectly stated that the source was required to submit a renewal application. There is no expiration date for a Registration, therefore the source is not required to apply for a renewal. The reference to IAPCB Regulation 2 was stricken, and references to OAQ and OES were updated to reflect current nomenclature.

~~The Permittee shall submit an application to renew this Registration prior to January 11, 2005. An application or notification shall be submitted in accordance with IAPCB Regulation 2 (permits) and state regulation 326 IAC 2 to the Air Quality Management Section (AQMS) and the Office of Air Management (OAM) OAQ and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.~~

#### **Conclusion**

The operation of this tire retreading facility shall be subject to the conditions of a Notice-Only Change 097-19410-00359 to Registration No. 097-11529-00359.

Company Name: Bauer Built, Inc.  
 Address, City, IN Zip: 5719 Kopetsky Drive, Suite A-E, Indianapolis, Indiana 46217  
 Date: September 1, 2006  
 Permit Number: 097-19410-00359  
 Reviewer: M.Doyle

**VOC SUMMARY FOR THE FACILITY**

**VOCs From Tire Buffing**

450 retreaded tires/day Pre-Cure  
 x 365 days/year  
 x 5.21E-04 lb VOCs/lb rubber ground off (AP42 Table 4.12-12 Carcass Emission Factors)  
 x 12.0 lbs/tire rubber ground off  
 / 2000 lbs/ton  


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 0.513 ton/yr VOCs for all retreaded tires

**VOCs From Spray Booth**

450 retreaded tires/day Pre-Cure  
 x 75 grams/tire dissolution (based on 2004 process studies)  
 x 454 grams/lb  
 x 365 days/yr  
 x 88.5% VOC content as heptane (88-88.5% VOC)  
 / 2000 lbs/ton  


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 12.007 ton/yr VOCs for retreaded tires  
 65.790 lbs/day

**VOCs From Tire Building**

**Pre-Cure Extruding**

450 retreaded tires/day  
 x 3.3 lbs rubber  
 x 1.23E-05 lb HAPs/lb rubber (AP42 Table 4.12-6 Extruding Emission Factors)  
 / 2000 lbs/ton  
 x 365 days/year  


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 0.003 ton/yr VOCs for pre-cure retreaded tires

**VOCs From Curing**

**Chamber Curing (Pre-cure)**

450 retreaded tires/day  
 x 125 lbs/tire  
 x 3.37E-04 lbs HAPs/lb rubber cured (AP42 Table 4.12-11 Curing Emission Factors)  
 80% rubber content of tire  
 40% 60% reduction in emissions due pre-cured rubber  
 / 2000 lbs/ton  
 x 365 days/year  


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 1.107 ton/yr VOCs for pre-cure retreaded tires

Total VOCs Emissions for the Facility	
0.513	ton/yr VOCs for grinding retreaded tires
12.007	ton/yr total VOCs from rubber dissolution usage
0.003	ton/yr VOCs for pre-cure ext retreaded tires
1.107	ton/yr VOCs for curing pre-cure cured retreaded tires
<b>13.6</b>	<b>ton/yr total VOCs</b>

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 Date: September 1, 2006  
 Permit Number: 097-19410-00359  
 Reviewer: M.Doyle

## HAPs SUMMARY FOR THE FACILITY

### HAPs From Tire Buffing

450 retreaded tires/day Pre-Cure  
 x 365 days/year  
 x 1.27E-04 lb HAPs/lb rubber ground off (AP42 Table 4.1212 Carcass Emission Factors -see Note 1)  
 x 12.0 lbs/tire rubber ground off (process study)  
 / 2000 lbs/ton  


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 0.1252 ton/yr HAPs for chamber cured tires

Note 1. Corrected to reflect new test data for toluene & methylene chloride. Stack test protocol was approved by the EPA & results have been submitted to the EPA.

### HAPs From Rubber Solution Application & Repair

none

### HAPs From Tire Building

Pre-Cure Extruding  
 450 retreaded tires/day - Mold Cure  
 x 3.3 lbs rubber  
 x 3.52E-05 lb HAPs/lb rubber (AP42 Table 4.12-6 Extruding Emission Factors)  
 / 2000 lbs/ton  
 x 365 days/year  


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 0.010 ton/yr HAPs for pre-cured retreaded tires

### HAPs From Curing

Chamber Curing (Pre-Cure)  
 450 retreaded tires/day Pre-Cure  
 x 125 lbs/tire  
 x 1.49E-04 lbs HAPs/lb rubber cured (AP42 Table 4.12-11 Curing Emission Factors)  
 / 2000 lbs/ton  
 80% rubber content  
 40% 60% reduction in emissions due to pre-cured rubber  
 x 365 days/year  


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 0.489 ton/yr HAPs for pre-cured retreaded tires

Total HAPs Emissions for the Facility	
0.125	ton/yr HAPs for grinding retreaded tires
0.010	ton/yr HAPs for pre-cure ext retreaded tires
none	ton/yr total HAPs from cement usage
0.489	ton/yr HAPs for curing pre-cure cured retreaded tires
<b>0.50</b>	<b>ton/yr total HAPs</b>

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## PM SUMMARY FOR THE FACILITY

### Tire Buffing with Cyclone

450 retreaded tires/day buffed  
x 12 lbs/tire rubber ground off \*  
/ 2000 lbs/ton  
x 365 days/yr  
x 1.00E+00 lbs PM/lb rubber ground off \*\*  
x 0.4% based on a 99.6 - 99.8% control efficiency determined from two different site stack tests

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3.9 ton/yr PM emitted from the buffing of truck tire carcasses  
21.6 lbs/day

### Rim Refurbishing

12000 lbs abrasive used per year  
x 0.69 lbs emissions/1000 lb abrasive used \*\*\*  
/ 1000 lbs abrasive used per month  
/ 2000 lbs/ton

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0.004 ton/yr PM emitted from rim refurbishing  
0.023 lbs/day

\* The value for rubber ground off at the Tire Buffing operation is based on process information supplied by the source, and approved by OES.

\*\* AP-42 Emission Factors for Rubber Manufacturing Industry (Table 4.12-12 Grinding Operations, Carcass)

\*\*\* AP-42 Particulate Emission Factors for Abrasive Blasting (Table 13.2.6-1)

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**Hot Water Heater Emissions**

Assumptions: 

Natural Gas	1,025
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 Btu/ft3

Given: 

Rating	2,006,742
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 BTU/hr

Type of Fuel	Fuel Usage b/a (ft3/hr) (c)	Fuel Usage c * 8760 (ft3/yr) (d)
Natural Gas (ft3)	1,958	17,150,302

NATURAL GAS CALCULATIONS							
Source	Fuel Usage (ft3/yr)	Pollutant	Emission Factor (lbs/10 <sup>6</sup> ft3)	Factor Source	Emission Rate (lbs/yr)	Annual Emissions (ton/yr)	Emission Rate (lbs/hr)
Emissions Based on Fuel Usage	17,150,302	CO	84	AP42-1998	1,441	0.720	0.164
		NOx	100	AP42-1998	1,715	0.86	0.196
		SO <sub>2</sub>	0.6	AP42-1998	10	0.005	0.001
		PM <sub>10</sub>	7.6	AP42-1998	130	0.065	0.015
		TSP	7.6	AP42-1998	130	0.065	0.015
		VOCs	5.5	AP42-1998	94	0.047	0.011
		Pb	0.0005	AP42-1998	0	0.000	0.000

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**Pollutants Summary for the Facility**

Pollutant	Buffing (tpy)	Rubber Solution Application (tpy)	Tire Building (tpy)	Curing (tpy)	60 HP Boiler (tpy)	Rim Refurbishing (tpy)	Total (tpy)
CO					0.72		0.72
HAPs	0.12	none	0.01	0.49			0.62
NO <sub>x</sub>					0.86		0.86
TSP/PM <sub>10</sub>	3.94				0.07	0.004	4.0
SO <sub>2</sub>					0.01		0.005
VOC	0.51	12.01	0.003	1.11	0.05		13.7
Pb	0.0020				0.00000		0.002