INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: April 6, 2005

RE: Freudenberg-NOK General Partnership / SPM 145-20346-00028

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 permit modification 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) 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.

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Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTV-PMOD.doc 1/10/05

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Ms. Stacy Flora
Freudenberg – NOK General Partnership
487 West Main Street
Morristown, IN 46161

April 6, 2005

Re: 145-20346-00028
Significant Permit Modification to:
Part 70 permit No.: T145-7643-00028

Dear Ms. Flora:

Freudenberg – NOK General Partnership was issued Part 70 operating permit T145-7643-00028 on May 26, 1999 for a rubber product manufacturing plant. A letter requesting changes to this permit was received on September 29, 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.

(a) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(b) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

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 Linda Quigley/EVP, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call Linda Quigley at (973) 575-2555, extension 3284, or call (800) 451-6027, press 0 and ask for extension (3-6878).

Sincerely,

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

Attachments
TSD, Significant Source Modification

LQ/EVP

cc:
File - Shelby County
Shelby County Health Department
Air Compliance Section Inspector – D.J. Knotts
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Freudenberg - NOK General Partnership
487 West Main Street
Morristown, Indiana 46161

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.: T145-7643-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 26, 1999 Expiration Date: May 26, 2004

First Administrative Amendment No.: 145-12973	Issuance Date: January 12, 2001
Second Administrative Amendment No.: 145-13948	Issuance Date: May 3, 2001
First Minor Permit Modification No.: 145-15586	Issuance Date: July 2, 2002
First Significant Permit Modification No.: 145-16661	Issuance Date: October 22, 2003

Second Significant Permit Modification No.: T145-20346-00028	Pages Affected: Entire Permit
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 6, 2005

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Semi-Annual Compliance Monitoring Report
Quarterly Report Forms

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 operate a stationary rubber product manufacturing process.

Responsible Official:	Plant Manager
Source Address:	487 West Main Street, Morristown, Indiana 46161
Mailing Address:	P.O. Box 245, Morristown, IN 46161-0245
SIC Code:	3053, 3069
County Location:	Shelby
County Status:	Non-attainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules and Major Source under Non-attainment New Source Review 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 source consists of the following emission units and pollution control devices:

(1) Four (4) rotary spray coater facilities, identified as CE01, each facility having a maximum capacity of 1,000 pounds of parts per hour, using no control, and exhausting to stack S1;

(2) Four (4) Grieve rubber curing ovens, oven #1 with a maximum capacity of processing 60.0 pounds of rubber per hour, ovens #2, #3 and #4 each with a maximum capacity of processing 28.5 pounds of rubber per hour, using no control, and exhausting to stacks identified as Grieve 1, 2, 3 and 4, respectively;

(3) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(4) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

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):

(1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

Other insignificant activities:

(2) One (1) Desma rubber molding press, with a maximum capacity of processing 11.0 pounds of rubber per hour.

(3) Three (3) REP rubber molding presses, each with a maximum capacity of processing 9.1 pounds of rubber per hour.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

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

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

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

B.18 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

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

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

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee**,** and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(1) Four (4) rotary spray coater facilities, identified as CE01, each facility having a maximum capacity of 1,000 pounds of parts per hour, using no control, and exhausting to stack S1.

(2) Four (4) Grieve rubber curing ovens, oven #1 with a maximum capacity of processing 60.0 pounds of rubber per hour, ovens #2, #3 and #4 each with a maximum capacity of processing 28.5 pounds of rubber per hour, using no control, and exhausting to stacks identified as Grieve 1, 2, 3 and 4, respectively

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 145-3306, ID 145-00028, issued on February 14, 1995, and 40 CFR 52 Subpart P, the particulate matter (PM) from the adhesive coating booth shall be 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

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from each of the four (4) rubber curing ovens shall be limited to 0.55 lb/hr.

D.1.2 Particulate [326 IAC 6-3-2(d)]

a) Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive coating booth shall be controlled by dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the adhesive coating booth is in operation.

D.1.3 Volatile Organic Compounds (VOC)

Due to the date of construction, there are no 326 IAC 8 rules applicable to this facility.

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

D.1.4 Training Requirements

(a) The Permittee shall implement an operator-training program.

(1) All spray booth operators or employees that perform maintenance at the facilities listed in CE01 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain a copy of the operator-training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

D.2.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(2) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(3) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

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

Construction Conditions

General Construction Conditions

D.3.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.3.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.3.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Operation Conditions

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

D.3.4 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

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

D.3.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

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

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.3.6 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5][326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, the thermal oxidizer for VOC control shall be in operation at all times when any of the three (3) automated surface coating booths, identified as TUMB1, TUMB2 and TUMB3 are in operation and maintain a minimum of 98% destruction and 90% capture efficiency for a period of one (1) year from the start of operation of any one (1) automated booth.

(b) Pursuant to 326 IAC 8-1-6, no later than one (1) year from the start of operation of any one (1) automated booth, or completion of permanent total enclosure, whichever is first, the thermal oxidizer for VOC control shall achieve a minimum of 98% destruction and 100% capture efficiency.

(c) Pursuant to 326 IAC 8-1-6, the total amount of VOC delivered to the coating applicators of the automated booths shall be limited to less than 127.20 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with Conditions D.3.6(a) and D.3.6(b) limits the potential to emit VOC from the automated coating booths to less than 16 tons per year for the first year of operation, and less than 3 tons per year thereafter.

(d) In order to render 326 IAC 8-1-6 not applicable, the total input usage of volatile organic compounds (VOC) at the one (1) manual coating booth, identified as MAN1, including VOC solvent and diluent usage, shall be less than 14.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the manual coating booth potential to emit VOC to less than 15 tons per twelve (12) consecutive month period.

Compliance with Conditions D.3.6(a), D.3.6(b) and D.3.6(c) shall render the requirements of Nonattainment NSR not applicable and satisfy the requirements of 326 IAC 8-1-6. Compliance with Condition D.3.6(d) shall render the requirements of 326 IAC 8-1-6 for the manual booth not applicable.

D.3.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) automated surface coating booths (TUMB1, TUMB2, and TUMB3) and the one (1) manual surface coating booth (MAN1), 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

D.3.8 Particulate [326 IAC 6-3-2(d)]

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

(b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the surface coating booths are in operation.

D.3.9 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 any control devices.

Compliance Determination Requirements

D.3.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Within sixty (60) days after achieving maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.3.6(a) for the thermal oxidizer utilizing methods as approved by the Commissioner.

(b) Within sixty (60) days after achieving permanent total enclosure but no later than one year after startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.3.6(b). This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC content and usage limitations contained in Condition D.3.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

(b) Compliance with the VOC emission limitation contained in Conditions D.3.6(a), D.3.6(b), D.3.6(c) and D.3.6(d) shall be determined using the following equation:

VOC emissions = VOC input * (1-% overall control efficiency)

Where overall control efficiency (including capture and destruction) is equal to the control efficiency determined by the most recent IDEM approved stack test.

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

D.3.12 Training Requirements

(a) The Permittee shall implement an operator-training program:

(1) All surface coating booth operators or employees that perform maintenance at the surface coating booths shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.3.13 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.6(a) and D.3.6(b), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.14 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.6(a) and D.3.6(b), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

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

D.3.15 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

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

D.3.16 Record Keeping Requirements

(a) To document compliance with Condition D.3.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month;

(4) The weight of VOCs emitted for each compliance period;

(5) The continuous temperature records (reduced to a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test; and

(6) Daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.3.12, the Permittee shall maintain a copy of the operator-training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.6(c) and D.3.6(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Freudenberg - NOK General Partnership
Source Address: 487 West Main Street, Morristown, IN 46161-0245
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
Part 70 Permit No.: T145-7643-00028

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Freudenberg - NOK General Partnership
Source Address: 487 West Main Street, Morristown, IN 46161-0245
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
Part 70 Permit No.: T145-7643-00028

This form consists of 2 pages **Page 1 of 2**

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

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451- 6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Freudenberg - NOK General Partnership
Source Address: 487 West Main Street, Morristown, IN 46161-0245
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
Part 70 Permit No.: T145-7643-00028

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Freudenberg - NOK General Partnership
Source Address: 487 West Main Street, Morristown, IN 46161-0245
Mailing Address: P.O. Box 245, Morristown, IN 46161-0245
Part 70 Permit No.: T145-7643-00028
Facility: One (1) manual surface coating booth, Three (3) automated surface coating booths
Parameter: VOC

Limits: The total input usage of volatile organic compounds (VOC) at the one (1) manual coating booth, identified as MAN1, including VOC solvent and diluent usage, shall be less than 14.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the manual coating booth potential to emit VOC to less than 15 tons per twelve (12) consecutive month period.
The total amount of VOC delivered to the coating applicators of the automated booths shall be limited to less than 127.20 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with Conditions D.3.6(a) and D.3.6(b) limits the potential to emit VOC from the automated coating booths to less than 16 tons per year for the first year of operation, and less than 3 tons per year thereafter.

YEAR:

Month	VOC Emissions This month	VOC Emissions previous 11 months	VOC Emissions 12 month total
	Column 1	Column 2	Column 1 + Column 2
1 manual booth Month 1			
1 manual booth Month 2			
1 manual booth Month 3			
3 automated booths Month 1			
3 automated booths Month2			
3 automated booths Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Freudenberg – NOK General Partnership**
Source Location:	**487 West Main Street, Morristown, Indiana 46161**
County:	**Shelby**
SIC Code:	**3053, 3069**
Operation Permit No.:	**T145-7643-00028**
Operation Permit Issuance Date:	**May 26, 1999**
Source Modification No.:	**SSM145-20174-00028**
Significant Permit Modification No.:	**SPM145-20346-00028**
Permit Reviewer:	**Linda Quigley/EVP**

The Office of Air Quality (OAQ) has reviewed a significant source modification and significant permit modification application from Freudenberg – NOK General Partnership relating to the construction and operation of four (4) surface coating booths.

History

On September 29, 2004, Freudenberg – NOK General Partnership submitted an application to the OAQ requesting to add additional surface coating lines to their existing plant. Freudenberg – NOK General Partnership was issued a Part 70 permit on May 26, 1999 and has a renewal application pending.

New Emission Units and Pollution Control Equipment

The application includes information relating to the approval for the construction and operation of the following equipment:

(a) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(b) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source was issued a Part 70 Operating Permit T145-7643-00028 on May 26, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 145-12973, issued on January 12, 2001;

(b) Second Administrative Amendment No.: 145-13948, issued on May 3, 2001;

(c) First Reopening No.: 145-13484, issued on March 18, 2002;

(d) First Minor Source Modification No.: 145-15859, issued on June 10, 2002;

(e) First Minor Permit Modification No.: 145-15586, issued on July 2, 2002; and

(f) First Significant Permit Modification No.: 145-16661, issued on October 22, 2003.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and 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 September 29, 2004. Additional information was received on November 3, 2004, November 23, 2004, December 15, 2004, and January 26, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages one (1) through four (4).

Potential To Emit Before Controls (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.”

Pollutant	Potential To Emit (tons/year)
PM	6.61
PM-10	6.65
SO_2	0.00
VOC	169.64
CO	0.55
NO_x	0.66

HAP's	Potential To Emit (tons/year)
Formaldehyde	< 10
Lead	< 10
Ethyl Benzene	< 10
MEK	< 10
MIBK	> 25
Xylene	> 25
Tetrachloroethylene	< 10
Methanol	> 25
TOTAL	>25

Justification for Modification

The Title V permit is being modified through a Significant Source Modification and Significant Permit Modification. The source modification is being performed pursuant to 326 IAC 2-7-10.5(f)(6), because the modification has the potential to emit of greater than ten (10) tpy of single HAP and greater than twenty-five (25) tpy of total HAPs. The permit modification shall incorporate the operating conditions of the source modification into the Part 70 Permit. The permit modification is being performed pursuant to 326 IAC 2-7-12(d) because the modification involves significant changes to the Part 70 Permit.

County Attainment Status

The source is located in Shelby County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Shelby County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Shelby County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. 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.

Source Status

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

Pollutant	Emissions (tons/year)
PM	16.50
PM-10	Negligible
SO_2	Negligible
VOC	105.85
CO	Negligible
NOx	Negligible
Single HAP	53.1
Combination HAPs	170.6

(a) This existing source is a major stationary source because a non-attainment regulated pollutant is emitted at a rate of 100 tons per year or more. This source is not one of the 28 listed source categories.

(b) Pollutant emissions are based upon information in Minor Permit Modification 145-15586, issued on July 2, 2002.

Potential to Emit After Controls for the Modification

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

	Potential to Emit Tons/year							
Process/facility	PM	PM10	SO2	VOC	CO	NOX	Single HAP	Total HAPs
Three (3) automated coating booths	4.95	4.95	0.00	24.93	0.00	0.00	> 10	> 25
One (1) manual coating booth	0.08	0.08	0.00	14.99	0.00	0.00	> 10	> 25
Thermal Oxidizer Combustion	0.01	0.05	0.00	0.04	0.55	0.66	Negl.	Negl.
Modification	5.04	5.08	0.00	39.96	0.55	0.66	34.03	36.69
Non-attainment NSR threshold	25.0	15.00	40.00	40.00	100.00	40.00	--	--

This modification to an existing major stationary source is not major because the emission increase is less than the Nonattainment NSR significant levels. Therefore, Nonattainment NSR requirements do not apply.

Federal Rule Applicability

(a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

The emission units in this modification do not have the potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

The existing units at the source are not currently subject to an emission limitation or standard and do not use control devices.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

(c) The three (3) automated surface coating booths and one (1) manual surface coating booth, identified as TUMB1, TUMB2, TUMB3 and MAN1, respectively, and the existing surface coating booths at this source are subject to 40 CFR Part 63, Subpart MMMM (Miscellaneous Metal Parts and Products) because the emission units coat metal parts and the source is a major source of HAPs. These units were determined to be units at an existing source. They are not new units because they are not at a totally new source. They are not reconstructed units because they are not currently replacing any existing units. This source is required to comply with this subpart by January 7, 2007.

This source is subject to National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] with the following conditions:

(1) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

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

(3) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(A) All coating operations as defined in 40 CFR 63.3981;
(B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Terminology used in this section is defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

Pursuant to 40 CFR 63.3910 (Notification Requirements), the source shall comply with the following notification requirements:

(1) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(2) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

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

Pursuant to 326 IAC 2-7-12 and 326 IAC 2-7-5 (Requirement to Submit a Significant Permit Modification Application), the Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(1) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(2) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(3) The significant permit modification application shall be submitted to:

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (PSD), this source, constructed in 1973, with modifications each year between 1997 and 2004, is still not considered a major source because it has the potential to emit less than 250 tons per year of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, do not apply.

Non-attainment New Source Review

Pursuant to Non-attainment New Source Review, this source, constructed in 1973 with modifications each year between 1997 and 2004, is a major source because it has the potential to emit greater than 100 tons per year of VOC and is located in Shelby County. The following limits shall apply in order to render the requirements of Non-attainment New Source Review not applicable:

(a) The thermal oxidizer for VOC control shall be in operation at all times when any of the three (3) automated surface coating booths, identified as TUMB1, TUMB2 and TUMB3 are in operation and maintain a minimum overall efficiency of 88.2%. Compliance with this condition shall limit the three (3) automated coating booths potential to emit VOC to less than 25 tons per twelve (12) consecutive month period, combined.

(b) The total input usage of volatile organic compounds (VOC) at the one (1) manual coating booth, identified as MAN1, including VOC solvent and diluent usage, shall be less than 14.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall limit the automated coating booths and manual coating booth potential to emit VOC to less than 40 tons per twelve (12) consecutive month period. Therefore the requirements of Non-attainment New Source Review will not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This modification is subject to 40 CFR Part 63, Subpart MMMM (Miscellaneous Metal Parts and Products). Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the three (3) automated surface coating booths and one (1) manual surface coating booth shall be limited by the following:

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

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

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

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. The three (3) automated coating booths have the potential VOC emissions greater than 25 tons per year. Therefore, they are subject to the requirements of 326 IAC 8-1-6.

(a) After conducting the top-down BACT analysis (refer App. B of TSD), the BACT for the three (3) automated surface coating booths has been determined as follows:

(1) The exhaust shall be vented to Regenerative Thermal Oxidizer with a minimum of 98% destruction and 90% capture efficiency for VOC for a period of time no longer than one (1) year from the start of operation of any one (1) automated booth;

(2) After one (1) year from the start of operation of any one (1) automated booth, or completion of permanent total enclosure, which ever is first, the Regenerative Thermal Oxidizer shall achieve a minimum of 98% destruction and 100% capture efficiency for VOC.

(3) The total amount of VOC delivered to the coating applicators of the automated booths shall be limited to less than 127.20 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with Conditions D.3.6(a) and D.3.6(b) limits the potential to emit VOC from the automated coating booths to less than 16 tons per year for the first year of operation, and less than 3 tons per year thereafter.

(b) The one (1) manual coating booth, identified as MAN1, shall have the following limit in order to render the requirements of 326 IAC 8-1-6 not applicable:

The total input usage of volatile organic compounds (VOC) at the one (1) manual coating booth, identified as MAN1, including VOC solvent and diluent usage, shall be less than 14.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the manual coating booth potential to emit VOC to less than 25 tons per twelve (12) consecutive month period.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The coating facilities TUMB1, TUMB2, TUMB3, and MAN1 are not subject to 326 IAC 8-2-9. Although these facilities coat metal parts, the primary Standard Industrial Classification Codes for this plant are 3053 and 3069, which are not listed under this rule. This source coats metal casings with adhesive which are then inserted into molded rubber parts to provide stability to the finished piece. Therefore, 326 8-2-9 does not apply.

Testing Requirements

Within sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the overall control efficiency of the thermal oxidizer as per Condition D.3.10 of the Part 70 Permit utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

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:

1. The three (3) automated and one (1) manual surface coating booths have applicable compliance monitoring conditions as specified below:

   The Permittee shall implement an operator-training program.

   (1) All spray booth operators or employees that perform maintenance at the automated and manual surface coating booths shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

   (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

   (3) All operators shall be given refresher training annually.

2. The thermal oxidizer has applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400°F.

   (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.13 of the Part 70 Permit, as approved by IDEM.

   (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

   (d) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.14 of the Part 70 Permit, as approved by IDEM.

(e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and the thermal oxidizer must operate properly to ensure compliance with 326 IAC 2-7 (Part 70), and 326 IAC 8-1-6.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit T145-7643-00028.

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

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

(1) Four (4) rotary spray coater facilities, identified as CE01, each facility having a maximum capacity of 1,000 pounds of parts per hour, using no control, and exhausting to stack S1;

(2) Four (4) Grieve rubber curing ovens, oven #1 with a maximum capacity of processing 60.0 pounds of rubber per hour, ovens #2, #3 and #4 each with a maximum capacity of processing 28.5 pounds of rubber per hour, using no control, and exhausting to stacks identified as Grieve 1, 2, 3 and 4, respectively;

(3) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(4) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

Section D.3 has been added to the permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(3) Three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, to be installed in 2005, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01 to be installed in 2005, which exhausts to one (1) stack, identified as RT01.

(4) One (1) manual coating booth, identified as MAN1, to be installed in 2005, with overspray controlled by dry filters, exhausting to one (1) stack, identified as RT01.

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

Construction Conditions

General Construction Conditions

D.3.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.3.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.3.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Operation Conditions

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

D.3.4 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

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

D.3.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

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

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.3.6 Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5][326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, the thermal oxidizer for VOC control shall be in operation at all times when any of the three (3) automated surface coating booths, identified as TUMB1, TUMB2 and TUMB3 are in operation and maintain a minimum of 98% destruction and 90% capture efficiency for a period of one (1) year from the start of operation of any one (1) automated booth.

(b) Pursuant to 326 IAC 8-1-6, no later than one (1) year from the start of operation of any one (1) automated booth, or completion of permanent total enclosure, whichever is first, the thermal oxidizer for VOC control shall achieve a minimum of 98% destruction and 100% capture efficiency.

(c) Pursuant to 326 IAC 8-1-6, the total amount of VOC delivered to the coating applicators of the automated booths shall be limited to less than 127.20 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with Condition D.3.6(a) and D.3.6(b) limits the potential to emit VOC from the automated coating booths to less than 16 tons per year for the first year of operation, and less than 3 tons per year thereafter.

(d) In order to render 326 IAC 8-1-6 not applicable, the total input usage of volatile organic compounds (VOC) at the one (1) manual coating booth, identified as MAN1, including VOC solvent and diluent usage, shall be less than 14.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the manual coating booth potential to emit VOC to less than 15 tons per twelve (12) consecutive month period.

Compliance with Conditions D.3.6(a), D.3.6(b) and D.3.6(c) shall render the requirements of Nonattainment NSR not applicable and satisfy the requirements of 326 IAC 8-1-6. Compliance with Condition D.3.6(d) shall render the requirements of 326 IAC 8-1-6 for the manual booth not applicable.

D.3.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) automated surface coating booths (TUMB1, TUMB2, and TUMB3) and the one (1) manual surface coating booth (MAN1), 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

D.3.8 Particulate [326 IAC 6-3-2(d)]

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

(b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the surface coating booths are in operation.

D.3.9 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 any control devices.

Compliance Determination Requirements

D.3.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Within sixty (60) days after achieving maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.3.6(a) for the thermal oxidizer utilizing methods as approved by the Commissioner.

(b) Within sixty (60) days after achieving permanent total enclosure but no later than one year after start up, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.3.6(b). This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC content and usage limitations contained in Condition D.3.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

(b) Compliance with the VOC emission limitations contained in Conditions D.3.6(a), D.3.6(b), D.3.6(c) and D.3.6(d) shall be determined using the following equation:

VOC emissions = VOC input * (1-%overall control efficiency)

Where overall control efficiency (including capture and destruction) is equal to the control efficiency determined by the most recent IDEM approved stack test.

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

D.3.12 Training Requirements

(a) The Permittee shall implement an operator-training program:

(1) All surface coating booth operators or employees that perform maintenance at the surface coating booths shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

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

D.3.13 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.6(a) and D.3.6(b), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.14 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.6(a) and D.3.6(b), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

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

D.3.15 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

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

D.3.16 Record Keeping Requirements

(a) To document compliance with Condition D.3.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month;

(4) The weight of VOCs emitted for each compliance period;

(5) The continuous temperature records (reduced to a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test; and

(6) Daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.3.12, the Permittee shall maintain a copy of the operator-training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.6(c) and D.3.6(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

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

A Quarterly Report Form has been added to the permit.

Condition C.15, now renumbered C.14, Emission Statement has been updated as follows:

~~C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]~~

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1st of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:~~

~~(1) Indicate actual emissions of criteria pollutants from the source;~~

~~(2) Indicate actual emissions of other regulated pollutants from the source.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

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

~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Condition C.12 has been updated as follows:

~~C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]~~

~~(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~

~~(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~

~~(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

~~(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~

~~(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~

~~(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such~~

~~request has not been denied or;~~

~~(3) An automatic measurement was taken when the process was not operating; or~~

~~(4) The process has already returned to operating within "normal" parameters and no response steps are required.~~

~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Conclusion

The construction and operation of the three (3) automated surface coating booths and one (1) manual surface coating booth shall be subject to the conditions of the attached proposed Significant Source Modification No. SSM145-20174-00028 and Significant Permit Modification No. SPM145-20346-00028.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Significant Source Modification and Significant Permit Modification to a Part 70 Permit

Source Background and Description

Source Name:	**Freudenberg – NOK General Partnership**
Source Location:	**487 West Main Street, Morristown, Indiana 46161**
County:	**Shelby**
SIC Code:	**3053, 3069**
Operation Permit No.:	**T145-7643-00028**
Operation Permit Issuance Date:	**May 26, 1999**
Source Modification No.:	**SSM145-20174-00028**
Significant Permit Modification No.:	**SPM145-20346-00028**
Permit Reviewer:	**Linda Quigley/EVP**

On February 5, 2005, the Office of Air Quality (OAQ) had a notice published in the Shelbyville News in Shelbyville, Indiana, stating that Freudenberg – NOK General Partnership had applied for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit to construct and operate four (4) surface coating booths. The notice also stated that OAQ proposed to issue the Significant Source Modification and Significant Permit Modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not these permits should be issued as proposed.

On February 22, 2005, Sheri Bussard from Environmental Quality Management, Inc., on behalf of Freudenberg – NOK General Partnership, submitted the complete Best Available Control Technology (BACT) analysis for the three (3) automated coating booths. The BACT analysis, located in Appendix B, has been revised as follows:

IDEM conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. The steps are discussed as follows:

1. Identify all potentially available control options

The first step in evaluating potential applicable control technologies involved a review of control technology determinations made for permitted miscellaneous metal parts and products surface coating sources. The USEPA's RACT /BACT /LAER clearinghouse (RBLC) database was searched for the purpose of identifying comparable sources that have implemented BACT for the affected facilities. This search was performed in the following steps (bold language has been added, language with a line through it has been stricken):

(a) A general search was first conducted in the Miscellaneous Metal Parts and Products Surface Coating (41.013). Thirty-seven (37) facilities and thirty-eight (38) processes were identified in the RBLC database for the past ten (10) years. Seven (7) of the thirty-eight (38) processes included the use of add-on control devices. The seven (7) identified sources were one (1) Arcadia, Inc. plant in California, two (2) Dynax America Corporation USA plants in Virginia, one (1) Certified Enameling Inc. plant in California, one (1) Watkins Manufacturing Corporation plant in California, one (1) Depor Industries, Inc. plant in Michigan, and one (1) Piston Coating plant in Michigan. The BACT or LAER determination has been based on use of add-on control devices at all the seven (7) facilities which are listed in Table 1.

Review of Table 1 reveals that add-on control devices with overall control (including capture and destruction) efficiencies from 72.9% to 98% have been established as BACT or LAER for variety of VOC sources, including surface coating operations. Consistent with these previous determinations, IDEM is proposing to agree with the source's request that a regenerative thermal oxidizer with a minimum ~~destruction~~ **overall** efficiency of 98% be established as BACT for this operation.

IDEM believes that the minimum control efficiency is consistent with what has served as the basis for BACT or LAER at the other surface coating operations and all facilities except the one with the lowest control efficiency (72.9%) use thermal oxidation.

Table 1- BACT and LAER determinations for Miscellaneous Metal Parts and Products Surface Coating

ID	**Date**	**BACT /LAER**	**Determination**	**Facility**
CA-0971	9/16/98	LAER	98% Thermal Oxidizer	Arcadia, Inc.
VA-0246 (2 plants)	8/18/00	BACT	97.5% Incinerator	Dynax America Corporation USA
CA-0879	9/17/97	BACT	97% Thermal Oxidizer	Certified Enameling, Inc.
CA-0985	8/20/01	LAER	90% Thermal Oxidizer/Carbon Adsorber	Watkins Manufacturing Corporation
MI-0280	3/27/00	BACT	81.0% Thermal Oxidizer	Depor Industries, Inc.
MI-0281	4/5/00	BACT	72.9 % Catalytic Oxidation/Adsorption Concentrator	E/M Engineered Coating Solutions

2. Cost analysis

Freudenberg is proposing to meet the BACT as determined using the USEPA's RACT /BACT /LAER Clearinghouse (RBLC) database, of an overall efficiency of 98% with a two (2) tiered approach. Freudenberg plans to install the new equipment in the same room where the existing coating equipment is located. There are several reasons for this. First the room and the associated electrical equipment have been specially designed for environments involving flammable and explosive solvent vapors. Second, the room is located adjacent to the phosphatizing line, which is the process step prior to adhesive application, thus facilitating process flow. Third, Freudenberg has floor space limitations which prohibit installation of coating equipment elsewhere within the plant. The initial cost estimate for adding a second adhesive application room at the plant was estimated to be ~~$150,000~~ **$146,500**. Therefore, Freudenberg would like to use the current coating room for the new coating equipment. Once the new equipment is installed and approved for coating all parts, the existing wall vent within the room will be permanently sealed, and the other room openings will be modified so that the room meets the requirements of a permanent total enclosure based on U.S. EPA Method 204.

Cost estimate for construction of entire new PTE room for proposed coaters: ~~$150,000~~ **$146,500**
Uncontrolled VOC PTE for three (3) automated coaters: 127.20 ton/yr

Transition period
- Capture Efficiency – 90%
- Destruction Efficiency – 98%
- Overall Control Efficiency – 88.2%
- Controlled VOC emissions – 15.01 ton/yr

Post-Transition period
- Capture Efficiency – 100%
- Destruction Efficiency – 98%
- Overall Control Efficiency – 98%
- Controlled VOC Emissions – 2.54 ton/yr

Total reduction from Transition period emissions to Final BACT emissions: 12.47 ton/yr
Cost in $ per ton removed: $~~12,030~~ **11,750**/ton

$~~12,030~~ **11,750** per ton of VOC removed is the cost incurred if Freudenberg were to add an additional coating room. This is not considered cost effective for controlling an additional 12.47 tons of VOC for a period of one year. Therefore, IDEM is allowing the Permittee to comply with 90% capture efficiency the first year and ~~98~~**100**% capture efficiency there after.

Indiana Department of Environmental Management
Office of Air Quality

Appendix B to the Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Freudenberg – NOK General Partnership**
Source Location:	**487 West Main Street, Morristown, Indiana 46161**
County:	**Shelby**
SIC Code:	**3053, 3069**
Operation Permit No.:	**T145-7643-00028**
Operation Permit Issuance Date:	**May 26, 1999**
Source Modification No.:	**SSM145-20174-00028**
Significant Permit Modification No.:	**SPM145-20346-00028**
Permit Reviewer:	**Linda Quigley/EVP**

The Indiana Department of Environmental Management (IDEM) has performed the following BACT review for a major modification to an existing rubber product manufacturing process owned and operated by Freudenberg – NOK General Partnership, located in Morristown, Indiana.

This modification will permit the construction of three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, with overspray controlled by dry filters, VOC and HAPs controlled by one (1) thermal oxidizer, identified as RT01, which exhausts to one (1) stack, identified as RT01.

The source is located in Shelby County which is designated as non-attainment for 8-hour ozone and attainment for all other criteria pollutants. Based upon emission calculations completed by IDEM and the source, the modification shall result in a net increase of potential volatile organic compound (VOC) emissions of greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-1-6 the source shall reduce VOC emissions from the new facilities, which are not regulated by other provisions of 326 IAC 8, using best available control technology (BACT). The purpose of this BACT Analysis is to evaluate the level of control that constitutes BACT for the affected facilities.

The specific facilities requiring evaluation in this analysis include three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3.

IDEM conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. The steps are discussed as follows:

1. Identify all potentially available control options

The first step in evaluating potential applicable control technologies involved a review of control technology determinations made for permitted miscellaneous metal parts and products surface coating sources. The USEPA's RACT /BACT /LAER clearinghouse (RBLC) database was searched for the purpose of identifying comparable sources that have implemented BACT for the affected facilities. This search was performed in the following steps:

(a) A general search was first conducted in the Miscellaneous Metal Parts and Products Surface Coating (41.013). Thirty-seven (37) facilities and thirty-eight (38) processes were identified in the RBLC database for the past ten (10) years. Seven (7) of the thirty-eight (38) processes included the use of add-on control devices. The seven (7) identified sources were one (1) Arcadia, Inc. plant in California, two (2) Dynax America Corporation USA plants in Virginia, one (1) Certified Enameling Inc. plant in California, one (1) Watkins Manufacturing Corporation plant in California, one (1) Depor Industries, Inc. plant in Michigan, and one (1) Piston Coating plant in Michigan. The BACT or LAER determination has been based on use of add-on control devices at all the seven (7) facilities which are listed in Table 1.

Review of Table 1 reveals that add-on control devices with overall control (including capture and destruction) efficiencies from 72.9% to 98% have been established as BACT or LAER for variety of VOC sources, including surface coating operations. Consistent with these previous determinations, IDEM is proposing to agree with the source's request that a regenerative thermal oxidizer with a minimum overall efficiency of 98% be established as BACT for this operation.

IDEM believes that the minimum control efficiency is consistent with what has served as the basis for BACT or LAER at the other surface coating operations and all facilities except the one with the lowest control efficiency (72.9%) use thermal oxidation.

Table 1- BACT and LAER determinations for Miscellaneous Metal Parts and Products Surface Coating

ID	Date	BACT /LAER	Determination	Facility
CA-0971	9/16/98	LAER	98% Thermal Oxidizer	Arcadia, Inc.
VA-0246 (2 plants)	8/18/00	BACT	97.5% Incinerator	Dynax America Corporation USA
CA-0879	9/17/97	BACT	97% Thermal Oxidizer	Certified Enameling, Inc.
CA-0985	8/20/01	LAER	90% Thermal Oxidizer/Carbon Adsorber	Watkins Manufacturing Corporation
MI-0280	3/27/00	BACT	81.0% Thermal Oxidizer	Depor Industries, Inc.
MI-0281	4/5/00	BACT	72.9 % Catalytic Oxidation/Adsorption Concentrator	E/M Engineered Coating Solutions

2. Cost analysis

Freudenberg is proposing to meet the BACT as determined using the USEPA's RACT /BACT /LAER Clearinghouse (RBLC) database, of an overall efficiency of 98% with a two (2) tiered approach. Freudenberg plans to install the new equipment in the same room where the existing coating equipment is located. There are several reasons for this. First the room and the associated electrical equipment have been specially designed for environments involving flammable and explosive solvent vapors. Second, the room is located adjacent to the phosphatizing line, which is the process step prior to adhesive application, thus facilitating process flow. Third, Freudenberg has floor space limitations which prohibit installation of coating equipment elsewhere within the plant. The initial cost estimate for adding a second adhesive application room at the plant was estimated to be $146,500. Therefore, Freudenberg would like to use the current coating room for the new coating equipment. Once the new equipment is installed and approved for coating all parts, the existing wall vent within the room will be permanently sealed, and the other room openings will be modified so that the room meets the requirements of a permanent total enclosure based on U.S. EPA Method 204.

Cost estimate for construction of entire new PTE room for proposed coaters: $146,500
Uncontrolled VOC PTE for three (3) automated coaters: 127.20 ton/yr

Transition period
- Capture Efficiency – 90%
- Destruction Efficiency – 98%
- Overall Control Efficiency – 88.2%
- Controlled VOC emissions – 15.01 ton/yr

Post-Transition period
- Capture Efficiency – 100%
- Destruction Efficiency – 98%
- Overall Control Efficiency – 98%
- Controlled VOC Emissions – 2.54 ton/yr

Total reduction from Transition period emissions to Final BACT emissions: 12.47 ton/yr
Cost in $ per ton removed: $11,750/ton

$11,750 per ton of VOC removed is the cost incurred if Freudenberg were to add an additional coating room. This is not considered cost effective for controlling an additional 12.47 tons of VOC for a period of one year. Therefore, IDEM is allowing the Permittee to comply with 90% capture efficiency the first year and 100% capture efficiency there after.

IDEM proposes a two (2) tier BACT for the three (3) automated coating booths, identified as TUMB1, TUMB2 and TUMB3, be as follows:

(1) The exhaust shall be vented to Regenerative Thermal Oxidizer with a minimum of 98% destruction and 90% capture efficiency for VOC no longer than one (1) year from the start of operation of any one (1) automated booth;

(2) After one (1) year from the start of operation of any one (1) automated booth, or completion of permanent total enclosure, which ever is first, the Regenerative Thermal Oxidizer shall achieve a minimum of 98% destruction and 100% capture efficiency for VOC.

(3) The total amount of VOC delivered to the coating applicators of the automated booths shall be limited to less than 127.20 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with Conditions D.3.6(a) and D.3.6(b) limits the potential to emit VOC from the automated coating booths to less than 16 tons per year for the first year of operation, and less than 3 tons per year thereafter.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6.

Appendix A: Emission Calculations

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 487 West Main Street, Moristown, IN 46161
Source Mod. No.: SSM 145-20174-00028
Permit Mod. No.: SPM 145-20346-00028
Plant I.D.: 145-00028
Reviewer: Linda Quigley/EVP
Date: September 29, 2004

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Three (3) Automated Surface Coating Booths	One (1) Manual Surface Coating Booth	**TOTAL**
PM	0.01	4.95	1.65	6.61
PM10	0.05	4.95	1.65	6.65
SO2	0.00	0.00	0.00	0.00
NOx	0.66	0.00	0.00	0.66
VOC	0.04	127.20	42.40	169.64
CO	0.55	0.00	0.00	0.55
total HAPs	negl.	133.87	58.02	191.89
worst case single HAP	negl.	123.54	54.58	178.12
		(xylene)	(xylene)	

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Three (3) Automated Surface Coating Booths	One (1) Manual Surface Coating Booth	**TOTAL**
PM	0.01	0.24	0.08	0.33
PM10	0.05	0.24	0.08	0.37
SO2	0.00	0.00	0.00	0.00
NOx	0.66	0.00	0.00	0.66
VOC	0.04	15.00	14.98	30.02
CO	0.55	0.00	0.00	0.55
total HAPs	negl.	15.81	10.44	26.25
worst case single HAP	negl.	14.58	9.82	24.40
		(xylene)	(xylene)	

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 487 West Main Street, Moristown, IN 46161
odification Number: SSM 145-20174-00028
lodification Number: SPM 145-20346-00028
Plt ID: 145-00028
Reviewer: Linda Quigley/EVP
Application Rec.: September 29, 2004

PUBLIC

Automated surface coating booths (3)

Material	Density (Lb/Gal)	Maximum Usage (gals)	Maximum Usage (lbs)	Weight % VOC	Volume % Water	Weight % Organics	Weight % Solids	Weight % Pb Salt	Weight % Formalde-hyde	Weight % Ethyl Benzene	Weight % MEK	Weight % MIBK	Weight % Xylene	Weight % Tetrachloro-ethylene	Weight % Methanol	Weight % Total Organic HAP	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
As-applied																								
C-1	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.07	193.77	35.36	1.10	:	60%
C-2	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.10	194.48	35.49	0.83	:	60%
C-3	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.70	208.83	38.11	1.40	:	60%
C-3	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.03	192.78	35.18	0.22	:	60%
C-5	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	7.69	184.64	33.70	**1.65**	:	60%
C-6	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	7.84	188.26	34.36	0.73	:	60%
C-7	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	**8.77**	**210.60**	**38.43**	0.96	:	60%
C-8	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.04	192.85	35.19	0.38	:	60%
C-9	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.14	195.36	35.65	0.44	:	60%
C-10	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.10	194.49	35.49	0.38	:	60%
Cleaning Solvents																								
Xylene	7.25	1095.00	7939.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	100.00%	7.25	7.25	**0.91**	**21.75**	**3.97**	0.00	n/a	n/a
MIBK	6.65	1095.00	7282.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	100.00%	6.65	6.65	0.83	19.95	3.64	0.00	n/a	n/a
Methanol	6.61	1095.00	7238.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%	6.61	6.61	0.83	19.83	3.62	0.00	n/a	n/a

Note: The above columns have been left blank because formulas and ingredients of the coatings are confidential trade secret information.

Potential Emissions, per booth = Worst case coating + worst case solvent	**9.68**	**232.35**	**42.40**	**1.65**
Controlled Emissions, per booth =	**1.14**	**27.42**	**5.00**	**0.08**

	Pb Salt tpy	Formalde-hyde tpy	Ethyl Benzene tpy	MEK tpy	MIBK tpy	Xylene tpy	Tetrachloro-ethylene tpy	Methanol tpy	**Total HAPs**
C-1	0.00	**0.11**	0.53	**0.53**	33.80	1.64	0.00	0.00	36.620
C-2	0.00	0.11	0.00	0.53	**35.49**	0.00	0.00	0.00	36.131
C-3	**0.50**	0.00	**1.50**	0.00	0.00	36.70	**1.96**	0.00	**40.653**
C-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.27	33.273
C-5	0.00	0.00	0.19	0.00	0.00	0.98	0.00	25.99	27.164
C-6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34.68	34.680
C-7	0.00	0.00	1.35	0.00	0.00	**37.21**	0.08	0.00	38.638
C-8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.55	28.551
C-9	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**34.89**	34.894
C-10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.55	28.551
Xylene	0.00	0.00	0.00	0.00	0.00	**3.97**	0.00	0.00	**3.969**
MIBK	0.00	0.00	0.00	0.00	**3.64**	0.00	0.00	0.00	3.641
Methanol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**3.62**	3.619
Potential Single HAP Emissions, per booth =	**0.50**	**0.11**	**1.50**	**0.53**	**39.13**	**41.18**	**1.96**	**38.51**	
Potential Total HAP Emissions, per booth =									**44.622**
Controlled Single HAP Emissions, per booth =	**0.06**	**0.01**	**0.18**	**0.06**	**4.62**	**4.86**	**0.23**	**4.54**	
Controlled Total HAP Emissions, per booth =									**5.27**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

Particulate controlled by dry filters with a 95% efficiency.

VOC and HAPs controlled by thermal oxidizer with an overall efficiency of 88.2%.

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 487 West Main Street, Moristown, IN 46161
Source Modification Number: SSM 145-20174-00028
Permit Modification Number: SPM 145-20346-00028
Plt ID: 145-00028
Reviewer: Linda Quigley/EVP
Application Rec.: September 29, 2004

PUBLIC

Manual surface coating booth (1)

Material	Density (Lb/Gal)	Maximum Usage (gals)	Maximum Usage (lbs)	Weight % VOC	Volume % Water	Weight % Organics	Weight % Solids	Weight % Pb Salt	Weight % Formalde-hyde	Weight % Ethyl Benzene	Weight % MEK	Weight % MIBK	Weight % Xylene	Weight % Tetrachloro-ethylene	Weight % Methanol	Weight % Total Organic HAP	Pounds VOC per gallon of coating less	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
As-applied																								
C-1	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.07	193.77	35.36	1.10	:	60%
C-2	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.10	194.48	35.49	0.83	:	60%
C-3	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.70	208.83	38.11	1.40	:	60%
C-4	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.03	192.78	35.18	0.22	:	60%
C-5	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	7.69	184.64	33.70	**1.65**	:	60%
C-6	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	7.84	188.26	34.36	0.73	:	60%
C-7	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	**8.77**	**210.60**	**38.43**	0.96	:	60%
C-8	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.04	192.85	35.19	0.38	:	60%
C-9	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.14	195.36	35.65	0.44	:	60%
C-10	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	:	8.10	194.49	35.49	0.38	:	60%
Cleaning Solvents																								
Xylene	7.25	1,095	7,939	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	100.0%	7.25	7.25	**0.91**	**21.75**	**3.97**	0.00	n/a	n/a
MIBK	6.65	1,095	7,282	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	100.0%	6.65	6.65	0.83	19.95	3.64	0.00	n/a	n/a
Methanol	6.61	1,095	7,238	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%	6.61	6.61	0.83	19.83	3.62	0.00	n/a	n/a

Note: The above columns have been left blank because formulas and ingredients of the coatings are confidential trade secret information

Potential Emissions = Worst case coating + worst case solven	**9.68**	**232.35**	**42.40**	**1.65**
Limited Emissions =			**14.98**	**0.08**

	Pb Salt tpy	Formalde-hyde tpy	Ethyl Benzene tpy	MEK tpy	MIBK tpy	Xylene tpy	Tetrachloro-ethylene tpy	Methanol tpy	**Total HAPs**
C-1	0.00	**0.11**	0.53	**0.53**	33.80	1.64	0.00	0.00	**36.620**
C-2	0.00	0.11	0.00	0.53	**35.49**	0.00	0.00	0.00	**36.131**
C-3	**0.50**	0.00	**1.50**	0.00	0.00	36.70	**1.96**	0.00	**40.653**
C-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.27	**33.273**
C-5	0.00	0.00	0.19	0.00	0.00	0.98	0.00	25.99	**27.164**
C-6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34.68	**34.680**
C-7	0.00	0.00	1.35	0.00	0.00	**37.21**	0.08	0.00	**38.638**
C-8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.55	**28.551**
C-9	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**34.89**	**34.894**
C-10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.55	**28.551**
Xylene	0.00	0.00	0.00	0.00	0.00	**17.37**	0.00	0.00	**17.370**
MIBK	0.00	0.00	0.00	0.00	**15.93**	0.00	0.00	0.00	**15.932**
Methanol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**15.84**	**15.837**
Potential Single HAP Emissions =	**0.50**	**0.11**	**1.50**	**0.53**	**51.43**	**54.58**	**1.96**	**50.73**	
Potential Total HAP Emissions =									**58.023**
Limited Single HAP Emissions =	**0.09**	**0.02**	**0.27**	**0.10**	**9.26**	**9.82**	**0.35**	**9.13**	
Limited Total HAP Emissions =									**10.44**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Particulate controlled by dry filters with a 95% efficiency.
Limited VOC emissions based on material usage limitation of less than 3920.1 gallons of material per year (based on worst case material).
Limited HAP emissions based on material usage limitation of less than 1971 gallons of material per year and less than 197.1 gallons of solvent per year (based on worst case material).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Thermal Oxidizer

Company Name: Freudenberg - NOK General Partnership
Address City IN Zip: 487 West Main Street, Moristown, IN 46161
Source Mod. No.: SSM 145-20174-00028
Permit Mod. No.: SPM 145-20346-00028
Plt ID: 145-00028
Reviewer: Linda Quigley/EVP
Date: September 29, 2004

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.5	13.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/	0.01	0.05	0.00	0.66	0.04	0.55

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combine
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recircula

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/1,00
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,
(SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 l