

TO: Interested Parties / Applicant CERTIFIED MAIL 7000 0600 0023 5187 0281
RE: Wingfoot Commercial Tire Systems, LLC / MSOP 097-20528-00320
FROM: Felicia A. Robinson
Manager of Environmental Planning

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within fifteen (15) calendar days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures



**MINOR SOURCE OPERATING PERMIT
 INDIANA DEPARTMENT OF ENVIRONMENTAL
 MANAGEMENT
 OFFICE of AIR QUALITY
 and
 INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES**

**Wingfoot Commercial Tire Systems, LLC
 1950 West Edgewood Avenue
 Indianapolis, Indiana 46217**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-20528-00320	
Issued by:	Issuance Date: October 21, 2005
ORIGINAL SIGNED BY:	Expiration Date: October 20, 2010
Felicia A. Robinson Manager of Environmental Planning Indianapolis Office of Environmental Services	

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary tire retreading operation.

Authorized Individual: Center Manager
Source Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Mailing Address: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
General Source Phone: (317) 788-8383
SIC Code: 7534
County Location: Marion
Source Location Status: Nonattainment for ozone under the 8-hour standard
Nonattainment for PM2.5
Attainment for all other criteria pollutants.
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as PO1A and PO1B, with a combined maximum capacity to grind 27 tires per hour, using a water mist/cyclone-fan/trailer system as particulate control, identified as C01, with cyclone exhaust identified as S01.
- (b) One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter, identified as C02, that has an efficiency of 99.9% on 0.5 micron particles, and exhausting to stack S03.
- (c) One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type filter, identified as C03, for particulate control, and exhausting to stack S04.
- (d) One (1) natural gas fired boiler, identified as B01, with a maximum heat input capacity of 1.7 million Btu per hour, exhausting to stack S02.
- (e) Operations with potential VOC emissions less than ten (10) tons per year, less than five (5) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.
 - (1) Tire curing operations.
 - (2) Tire repair operations using organic materials, including vulcanizing cement (maximum of 4.7 gallons per year) and liner repair sealer (maximum 9 gallons per year).
 - (3) One (1) tread extruder applying a maximum of 25 pounds of tread rubber onto a

maximum of 3.2 tires per hour.

- (4) One (1) cushion extruder processing a maximum of 3.5 pounds of extruded rubber onto a maximum of 14.4 tires per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate 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.

B.2 Definitions

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, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (d) The notification 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, and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.

Indianapolis, IN 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, Air Permits, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: (317) 327-2234 (ask for OES,

Compliance), to determine the appropriate permit fee.

B.12 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 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).

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved

by IDEM, OAQ, and OES.

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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The administrator may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by OAQ, OES or the U.S. EPA.

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

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. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 Compliance Response Plan - Preparation and Implementation

- (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, OAQ, and OES 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, 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, and OES 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) 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.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

- (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, and OES that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the re-testing deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to IDEM, OAQ, and OES or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to IDEM, OAQ, and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

-
- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
 - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]

- (a) 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
Indianapolis, Indiana 46204
- and
- Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221
- (b) 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, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as PO1A and PO1B, with a combined maximum capacity to grind 27 tires per hour, using a water mist/cyclone-fan/trailer system as particulate control, identified as C01, with cyclone exhaust identified as S01.

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

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, shall each be limited to three hundredths (0.03) grain per dry standard cubic foot of exhaust air.
- (b) Combined total PM emissions from the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, shall be limited to fifty seven (57.0) pounds per hour. This limitation is equivalent to a potential to emit of less than two hundred fifty (250) tons of PM emissions per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, at all times tire buffing is in operation, water misting and cyclone controls must be in operation. The tubes transporting tire buffing waste from the buffing station to the cyclone and to the trailer shall be sealed and have sealed connections.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred twenty (120) days after issuance of this MSOP, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing for the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, utilizing methods as approved by the Administrator. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone exhaust identified as S01 and the trailer vents shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part

of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.1.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the tire buffing operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the cyclone exhaust identified as S01 and the trailer vents.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter, identified as C02, that has an efficiency of 99.9% on 0.5 micron particles, and exhausting to stack S03.

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

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) Rimm-Clean shot blast machine, identified as P04, shall be limited to three hundredths (0.03) grain per dry standard cubic foot of exhaust air.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the cartridge-type filter, identified as C02 for particulate control, shall be in operation and control emissions from the Rimm-Clean shot blast machine at all times that the Rimm-Clean shot blast machine is in operation.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections 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.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type filter, identified as C03, for particulate control, and exhausting to stack S04.

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

Emission Limitations and Standards

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) powder coating booth, identified as P05, shall be limited to three hundredths (0.03) grain per dry standard cubic foot of exhaust air.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Control

In order to comply with Condition D.3.1, the cartridge-type filter, identified as C03 for particulate control, shall be in operation and control emissions from the powder coating booth at all times that the powder coating booth is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records of any additional inspections 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.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) natural gas fired boiler, identified as B01, with a maximum heat input capacity of 1.7 million Btu per hour, exhausting to stack S02.
- (e) Operations with potential VOC emissions less than ten (10) tons per year, less than five (5) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.
 - (1) Tire curing operations.
 - (2) Tire repair operations using organic materials, including vulcanizing cement (maximum of 4.7 gallons per year) and liner repair sealer (maximum 9 gallons per year).
 - (3) One (1) tread extruder applying a maximum of 25 pounds of tread rubber onto a maximum of 3.2 tires per hour.
 - (4) One (1) cushion extruder processing a maximum of 3.5 pounds of extruded rubber onto a maximum of 14.4 tires per hour.

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

Emission Limitations and Standards

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(b)(3)]

Pursuant to 326 IAC 6-1-2(b)(3) (Nonattainment Area Particulate Limitations), particulate emissions from the one (1) natural gas fired boiler, identified as B01, shall be limited to one hundredths (0.01) grain per dry standard cubic foot of exhaust air.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
and
Indianapolis OES
Air Compliance**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Wingfoot Commercial Tire Systems, LLC
Address:	1950 West Edgewood Avenue
City:	Indianapolis, Indiana 46217
Phone #:	(317) 788-8383
MSOP #:	097-20528-00320

I hereby certify that Wingfoot Commercial Systems is: still in operation.
 no longer in operation.

I hereby certify that Wingfoot Commercial Systems is:
 in compliance with the requirements of MSOP **097-20528-00320**.
 not in compliance with the requirements of MSOP **097-20528-00320**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
FAX NUMBER – 317-233-5967
and
Indianapolis OES
Air Compliance
FAX NUMBER – 317-327-2274

MALFUNCTION REPORT

PAGE 1 OF 2

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

***SEE PAGE 2**

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

INDIANA DEPARTMENT of ENVIRONMENTAL MANAGEMENT
OFFICE of AIR QUALITY
and
CITY of INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Wingfoot Commercial Tire Systems, LLC
Source Location:	1950 West Edgewood Avenue, Indianapolis, IN 46217
County:	Marion
SIC Code:	7534
Operation Permit No.:	097-20528-00320
Permit Reviewer:	M. Caraher

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a transition application from a FESOP to MSOP for Wingfoot Commercial Tire Systems, LLC relating to the operation of a tire retreading source.

Justification for the Transition from a FESOP F097-15259-00320 to a Minor Source Operating Permit (MSOP)

This existing source was issued FESOP 097-15259-00320 on April 26, 2004. The potential to emit PM-10 from the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, was limited by Condition D.1.1 to 1.9 pounds per hour (7.03 tons per twelve consecutive month period with compliance determined at the end of each month) such that 326 IAC 2-7 (Part 70 Permit Program) does not apply to this source.

Condition D.1.4 of FESOP 097-15259-00320 required this source to conduct PM-10 stack testing within one hundred eighty (180) days of the FESOP issuance date to verify compliance with Condition D.1.1. The source conducted and OES witnessed PM-10 stack testing within the one hundred eighty (180) day of permit issuance period on September 3, 2004. However, the PM-10 stack test was conducted after the water mist spray used at the rasp and prior to cyclone emissions control. Therefore, a site-specific PM-10 emission factor can also be utilized in the determination of the potential to emit PM-10 as well as to demonstrate compliance with Condition D.1.1.

Stack testing results determined the PM-10 emission rate from tire buffing, after the water mist spray at the rasp, is 0.26 pounds per hour (which demonstrated compliance with Condition D.1.1), which is equivalent to 0.0009 pounds per pound of tires buffed and 1.82 pounds per ton of tires buffed. The water mist at the rasp provides a fifty percent (50%) reduction in uncontrolled emissions (see Appendix A page 4 of 6). Therefore, the site-specific PM-10 emission factor for tire buffing at this source (see Appendix A page 4 of 6) is now 0.0018 pounds per pound of tires buffed or 3.64 pounds per ton of tires buffed. Based on the stack test findings, the source wide potential to emit PM-10 is 37.12 tons per year (see Appendix A page 6 of 6). As a result of the stack test findings, Wingfoot Commercial Systems, LLC requests that the source wide potential to emit PM-10 be reevaluated, that the reevaluation determine the source wide potential to emit PM-10 is less than one hundred tons (100) per year and that this source is now eligible to be permitted as a MSOP.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as PO1A and PO1B, with a combined maximum capacity to grind 27 tires per hour, using a water mist/cyclone-fan/trailer system as particulate control, identified as C01, with cyclone exhaust identified as S01.
- (b) One (1) Rimm-Clean shot blast machine, installed in 1997, identified as P04, with a maximum capacity of 240 rims per day, which is controlled by a cartridge-type filter, identified as C02, that has an efficiency of 99.9% on 0.5 micron particles, and exhausting to stack S03.
- (c) One (1) powder coating booth, installed in 1997, identified as P05, with a maximum capacity of 240 rims per day, using a cartridge-type filter, identified as C03, for particulate control, and exhausting to stack S04.
- (d) One (1) natural gas fired boiler, identified as B01, with a maximum heat input capacity of 1.7 million Btu per hour, exhausting to stack S02.
- (e) Operations with potential VOC emissions less than ten (10) tons per year, less than five (5) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs.
 - (1) Tire curing operations.
 - (2) Tire repair operations using organic materials, including vulcanizing cement (maximum of 4.7 gallons per year) and liner repair sealer (maximum 9 gallons per year).
 - (3) One (1) tread extruder applying a maximum of 25 pounds of tread rubber onto a maximum of 3.2 tires per hour.
 - (4) One (1) cushion extruder processing a maximum of 3.5 pounds of extruded rubber onto a maximum of 14.4 tires per hour.

Existing Approvals

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

Federally Enforceable State Operating Permit, F097-15259-00320, issued on April 26, 2004.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) F097-15259-00320, issued on April 26, 2004.

Condition D.1.1 (Particulate Emission Limitations, Work Practices and Control Technologies) [326 IAC 6-3-2][326 IAC 2-8-4]: Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the tire buffing operations, identified as P01A and P01B, shall be controlled by the following equation:

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

The maximum process weight rate for tire buffing operations is 0.3125 tons per hour. Therefore, the rate of emissions from tire buffing operations shall not exceed 1.9 pounds per hour of particulate matter.

Condition D.2.1 (Particulate Emission Limitations, Work Practices and Control Technologies) [326 IAC 6-3-2][326 IAC 2-8-4]: Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the shot blasting operations, identified as P04, shall be controlled by the following equation:

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

The maximum process weight rate for shot blasting operations is 0.325 tons per hour. Therefore, the rate of emissions from shot blasting operations shall not exceed 1.93 pounds per hour of particulate matter.

Condition D.3.1 (Particulate Emission Limitations, Work Practices and Control Technologies) [326 IAC 6-3-2]: Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the powder coating booth, identified as P05, shall be controlled by the following equation:

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

The maximum process weight rate for the powder coating booth is 0.325 tons per hour. Therefore, the rate of emissions from the powder coating booth shall not exceed 1.93 pounds per hour of particulate matter.

Condition D.4.1 (Particulate Emissions Limitations for Sources of Indirect Heating) [326 IAC 6-2-2] The natural gas boiler is subject to the provisions of 326 IAC 6-2-1(d) because it is a source of indirect heat and is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The total maximum operating capacity of the boiler is 1.7 million Btu per hour (MMBtu/hr). For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, pounds of particulate matter emitted per million Btu shall not exceed 0.6 for the natural gas boiler.

Reason not incorporated: This source is located in Marion County and the potential to emit particulate from this source is greater than one hundred (100) tons per year (see Appendix A page 6 of 6). Therefore, this source is subject to the provisions of 326 IAC 6-1 (Particulate Rules: Nonattainment Area Limitations). Sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(b) through (g) or 326 IAC 6-1-12, shall not exceed three hundredths (0.03) grain per dry standard cubic foot of exhaust air. Therefore, particulate emissions from the tire buffing operations, identified as P01A and P01B, shot blasting operations, identified as P04, and the powder coating booth, identified as P05, shall each not exceed three hundredths (0.03) grain per dry standard cubic foot of exhaust air. Pursuant to 326 IAC 6-1-2(b)(3), particulate emissions from the natural gas

fired boiler, identified as B01, shall not exceed one hundredth (0.01) grains per dry standard cubic foot of exhaust air.

- (b) F097-15259-00320, issued on April 26, 2004.

Condition D.1.4 (Testing Requirements) [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]: Within 180 days after issuance of this FESOP, the Permittee shall conduct PM-10 testing for the two (2) tire buffers, identified as P01A and P01B, in order to demonstrate compliance with Condition D.1.1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C-Performance Testing.

Reason not incorporated: The source conducted and OES witnessed PM-10 stack testing within the one hundred eighty (180) day of permit issuance period on September 3, 2004. Stack testing results determined PM-10 emissions from tire buffing at this source was 0.26 pounds per hour, which demonstrated compliance with Condition D.1.1. Stack testing was performed prior to cyclone emissions control. Therefore, the potential to emit PM-10 from tire buffing operations is 3.28 tons per year (see Appendix A page 4 and 6 of 6). In addition, Condition D.1.1 referenced 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies) as the applicable requirement for PM-10 emissions. 326 IAC 6-3-2 is not an applicable requirement for PM-10 emissions. Repeating a PM-10 stack test at least once every five (5) years from the date of the most recent valid compliance demonstration is no longer necessary because the potential to emit PM-10 from tire buffing operations is less than 3.28 tons per year (see Appendix A page 4 and 6 of 6).

The following conditions from previous approvals have been revised for this approval and issuance:

- (a) F097-15259-00320, issued on April 26, 2004.

Condition D.1.3 (Particulate Control): In order to comply with D.1.1, at all times tire buffing is in operation, water misting and cyclone controls must be in operation, ~~and the. The~~ tubes transporting tire buffing waste from the buffing station to the cyclone and to the ~~truck trailer~~ shall be sealed and have sealed connections. ~~The number of tires buffed per twenty-four consecutive hours shall not exceed one hundred eighteen (118).~~

Reason revised: The limitation of one hundred eighteen (118) tires buffed per twenty four (24) consecutive hour period was established to limit the averaged hourly process weight rate such that particulate emissions would demonstrate compliance with the Condition D.1.1 particulate emission limitation of 1.9 pounds per hour established pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Because this source has the potential to emit particulate in excess of one hundred (100) tons per year (see Appendix A page 4 and 6 of 6), 326 IAC 6-1 (Particulate Rules: Nonattainment Area Limitations) is the applicable requirement for particulate emissions from this source. Therefore, a throughput limit based on an averaged hourly process weight rate limit is not needed to demonstrate compliance with 326 IAC 6-1 (Particulate Rules: Nonattainment Area Limitations).

In addition, the word truck has been replaced with trailer to be consistent with the description. The tubes transporting tire buffing waste to the trailer shall be sealed and have sealed connections in order to ensure that the cyclone exhaust is the single emission point for the tire buffing process and control system. This review and issuance, 097-20528-00320, contains a PM stack test requirement (see Testing Requirements section of this TSD). Because the cyclone exhaust will be stack tested to verify compliance with the

requirements of 326 IAC 6-1-2(a), the tubes transporting tire buffing waste from the buffing station to the cyclone and to the trailer shall be sealed and have sealed connections.

- (b) F097-15259-00320, issued on April 26, 2004.

Emission unit description in Condition A.2(a) and Section D.1 description box: Two (2) Cahill KW-30 tire buffers, installed in 1997, identified as PO1A and PO1B, with a combined maximum capacity to grind ~~27 150~~ tires per ~~hour day~~, using a water mist/cyclone-fan/trailer system **as particulate control**, identified as C01, **with cyclone exhaust identified as** ~~and exhausting to stack S01~~.

Reason revised: The PM-10 stack test of September 3, 2004 determined tire buffing capacity in the two (2) Cahill KW-30 tire buffers, installed in 1997 and identified as PO1A and PO1B, was not 150 tires per day but averaged 27 tires per hour. In addition, Wingfoot verified that there is no stack for the particulate control system and that the exhaust point is at the cyclone exhaust identified as SO1.

- (c) F097-15259-00320, issued on April 26, 2004.

Condition D.1.5(a) (Visible Emissions Notations): Daily visible emission notations of the **cyclone exhaust identified as S01** ~~stack exhaust~~ **and the trailer vents** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Condition D.1.8(b) (Record Keeping Requirements): To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the **cyclone exhaust identified as S01** ~~stack exhaust~~ **and the trailer vents**.

Reason Revised: The OES inspector and Wingfoot have verified that the stack at this source is the cyclone exhaust identified as S01. The tire buffing waste storage trailer has small openings near the top of the trailer(s) termed vents, for which visible emission notations shall be performed to ensure that emissions do not arise from trailer storage of tire buffing waste. Therefore, these revisions were made to accurately reflect the visible emission and record keeping requirements for this source.

Enforcement Issue

- (a) The source has the following enforcement actions pending:
- (1) Notice of Violation for failure to keep records pursuant to Operation Condition No. 18 of Construction Permit 097-0320-01 issued October 31, 1997.
 - (2) IDEM, OAQ, and OES are aware that the source did not apply for a Part 70 Operating Permit or a FESOP in a timely manner prior to the issuance of F097-15259-00320 on April 26, 2004. IDEM, OAQ, and OES are reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
SO1	Tire buffing	24	0.75	2127	ambient
SO3	Shot blasting	24	1.17	2273	ambient
SO4	Powder coating booth	24	1.0	2170	ambient

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
SO2	Boiler	24	0.5	907	400

Recommendation

The staff recommends to the Administrator that the Minor Source Operating Permit 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.

A complete application for the purposes of this review was received on January 3, 2005. This transition application request was made following the submittal of the PM-10 stack test results report on October 7, 2004.

Emission Calculations

See Appendix A pages 1 through 6 of 6 of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	945.04
PM-10	37.12
SO ₂	0.0
VOC	4.49
CO	0.63
NO _x	0.74

HAPs	Potential to Emit (tons/yr)
Hexane	0.01
Total	0.01

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10, SO₂, VOC, CO and NO_x are each less than one hundred (100) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program). The potential to emit PM and PM-10 are each greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO ₂	maintenance attainment
NO _x	attainment
8-hour Ozone	basic non-attainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as non-attainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM-10 emissions as surrogate for PM_{2.5} emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO_x, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	45.82
PM-10	0.42

Pollutant	Emissions (tons/yr)
SO ₂	0.0
VOC	4.49
CO	0.63
NO _x	0.74
Single HAP	0.01
Combination HAPs	0.01

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on F097-15259-00320, issued on April 26, 2004, and on the September 3, 2004 PM-10 stack test results for tire buffing operations at this source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit, 097-20528-00320, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

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

This source is not subject to 40 CFR 60.540 Subpart BBB (Standards of Performance for the Rubber Tire Manufacturing Industry) and 326 IAC 12 because this source is a tire retreading operation and not a rubber tire manufacturing plant. Therefore, Wingfoot Commercial Tire Systems is not subject to 40 CFR 60.540 Subpart BBB.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, and 40 CFR Part 63) included in this permit.

This source is not subject to 40 CFR 63.5980 Subpart XXXX (National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing Industry) and 326 IAC 20 because this source is not a major source of hazardous air pollutants. Therefore, Wingfoot Commercial Tire Systems is not subject to 40 CFR 63.5980 Subpart XXXX.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This source commenced construction and operation in 1997. This source was not deemed a major stationary source because no attainment regulated pollutant emissions are equal to or

greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and no attainment or non-attainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3.

The PM-10 stack test of September 3, 2004 determined tire buffing capacity in the two (2) Cahill KW-30 tire buffers, installed in 1997 and identified as PO1A and PO1B, was not 150 tires per day but averaged 27 tires per hour. Utilizing the site-specific PM-10 emission factor for tire grinding developed from the PM-10 stack test, the unrestricted potential to emit PM-10 from tire grinding is 3.28 tons per year (see TSD Appendix A page 4 of 6).

Utilizing the AP-42 PM emission factor for tire grinding and at a maximum hourly average tire grinding capacity of 27 tires per hour yields the uncontrolled potential to emit 911.19 tons per year of PM (see TSD Appendix A page 4 of 6). Operation of the water mist control system at the rasp and the use of the cyclone for PM/PM-10 emission control limits PM emissions after control to less than 250 tons per year (see TSD Appendix A page 4 of 6). Operation of the water mist control system at the rasp and operation of the cyclone at all times tire buffing is in operation is required such that 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) does not apply to this source. In order to make this limitation enforceable, as a practical matter, combined total PM emissions from the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, shall be limited to fifty seven (57.0) pounds per hour (250 tons per year x 2000 lbs per ton x year / 8760 hours = 57.0 pounds PM per hour). This limitation is equivalent to a potential to emit of less than two hundred fifty (250) tons of PM emissions per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-4.1 (New Source Toxics Control)

This existing source commenced operation after July 27, 1997 but does not have the potential to emit any single hazardous air pollutant (HAP) equal to or greater than ten (10) tons per year nor does this source have the potential to emit HAP of equal to or greater than twenty-five (25) tons per year for any combination of HAP. This source did not undergo construction or reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-6.1 (Minor Source Operating Permit Program)

The potential to emit PM-10, NO_x, CO, SO₂ and VOC are each less than one hundred (100) tons per year. Wingfoot Commercial Tire Systems is not a major source of hazardous air pollutants (HAP). The potential to emit PM and PM-10 are each greater than twenty-five (25) tons per year. Therefore, this source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.

326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP))

Prior to the issuance of F097-15259-00320 on April 26, 2004, the source's unrestricted potential to emit PM-10 from the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, was estimated at 210.92 tons per year (see TSD Appendix A pages 4 and 6 of 6 for F097-15259-00320). Therefore, the source was subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program) and opted to be permitted pursuant to the provisions of 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP)). The September 3, 2004 PM-10 stack test for the two (2) Cahill KW-30 tire buffers demonstrated that the unrestricted potential to emit PM-10 is less than one hundred (100) tons per year (see TSD Appendix A pages 4 and 6 of 6).

Therefore, this source is no longer subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP)).

326 IAC 4-2 (Incinerators)

This source does not have an incinerator. Therefore, this source is not subject to 326 IAC 4-2 (Incinerators).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (Particulate Rules: Nonattainment Area Limitations)

Sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(b) through (g) or 326 IAC 6-1-12, shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust. This source has the potential to emit greater than one hundred (100) tons per year of particulate and is not otherwise limited by 326 IAC 6-1-12. Therefore, the provisions of 326 IAC 6-1 (Particulate Rules: Nonattainment Area Limitations) apply to this source.

The two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, shall each not exceed three hundredths grain (0.03) per dry standard cubic foot of exhaust. Pursuant to 326 IAC 6-1-2(b)(3), the one natural gas fired boiler, identified as B01, shall not exceed one hundredths (0.01) grain per dry standard cubic foot of exhaust.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

See discussion under **State Rule Applicability – Individual Facilities** of this Technical Support Document.

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

Pursuant to 326 IAC 6-3-2(c), this rule shall not apply if a particulate matter limitation established in 326 IAC 6-1 is more stringent than the limitation established in this rule. The potential to emit particulate exceeds one hundred (100) tons per year (see Appendix A page 6 of 6). Therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) does not apply to this source.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the provisions of 326 IAC 6-4 for 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).

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

This source does not have the potential to emit fugitive particulate matter equal to or greater than twenty five (25) tons per year. Therefore, this source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions).

326 IAC 7 (Sulfur Dioxide Rules)

No emission unit at this source has the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) (see TSD Appendix A page 1 and 6 of 6). Therefore, this source is not subject to 326 IAC 326 IAC 7 (Sulfur Dioxide Rules).

326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)

Neither the source or any specific emission unit at this source is specifically identified in 326 IAC 7-4-2. Therefore, 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations) does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

See discussion under **State Rule Applicability – Individual Facilities** of this Technical Support Document.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities)

This source does not have any emission unit, otherwise regulated by other provisions of 326 IAC 8, with the potential to emit twenty-five (25) tons or more per year of volatile organic compounds (VOC) (see Appendix A page 6 of 6). Therefore, 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) does not apply to Wingfoot Commercial Tire Systems.

326 IAC 9 (Carbon Monoxide Emission Rules)

There are no provisions under 326 IAC 9 (Carbon Monoxide Emission Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 9 (Carbon Monoxide Emission Rules).

326 IAC 10 (Nitrogen Oxide Rules)

There are no provisions under 326 IAC 10 (Nitrogen Oxide Rules) applicable to any specific emission unit or operation at this source. This source has not opted in to 326 IAC 10 (Nitrogen Oxide Rules). Therefore, this source is not subject to 326 IAC 10 (Nitrogen Oxide Rules).

326 IAC 11 (Emission Limitations for Specific Types of Operations)

This tire retreading operation does not perform any specific type of operation identified in 326 IAC 11 (Emission Limitations for Specific Types of Operations). Therefore, this source is not subject to 326 IAC 11 (Emission Limitations for Specific Types of Operations).

326 IAC 12 (New Source Performance Standards)

See discussion under **Federal Rule Applicability** section of this Technical Support Document.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

There are no provisions under 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 15 (Lead Rules)

Wingfoot Commercial Tire Systems is not specifically identified in 326 IAC 15 (Lead Rules) and there are no provisions under 326 IAC 15 (Lead Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 15 (Lead Rules).

326 IAC 17 (Public Records; Confidential Information; Confidentiality Agreements)

Wingfoot Commercial Tire Systems has not filed or claimed any application, source or permit information for this review and MSOP issuance, 097-20528-00320, as confidential, pursuant to 326 IAC 17-1-6 (Public Records: Confidentiality Claims).

326 IAC 20 (Hazardous Air Pollutants)

Wingfoot Commercial Tire Systems is not a major source of hazardous air pollutants (HAP) and does not perform operations specifically identified in 326 IAC 20. Therefore, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants).

326 IAC 21 (Acid Deposition Control)

Wingfoot Commercial Tire Systems is not subject to the Acid Rain Program Provisions of Title IV of the 1990 Clean Air Act Amendments as listed in 40 CFR Part 72 through 78 and is, therefore, not subject to 326 IAC 21 (Acid Deposition Control).

State Rule Applicability – Individual Facilities

Powder coating booth, identified as P05

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations)

The one (1) Powder coating booth, identified as P05, is not subject to 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations) because potential VOC emissions from P05 do not exceed twenty five (25) tons per year and actual VOC emissions from P05 do not exceed fifteen (15) pounds per day. Therefore, 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations) does not apply to the one (1) Powder coating booth, identified as P05.

Testing Requirements

In utilizing AP-42 emission factors for the two (2) Cahill KW-30 tire buffers, identified as P01A and P01B, rated buffing capacity and exhaust air flow rate, non-compliance with 326 IAC 6-1-2(a) is predicted by calculation (see Appendix A page 4 of 6). Therefore, particulate stack testing for P01A and P01B at the cyclone exhaust identified as S01 shall be required within one hundred twenty (120) days of MSOP issuance.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 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, and OES in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-6.1-5. 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 in 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.

1. The compliance monitoring requirements applicable to the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, at this source are as follows:
 - (a) Daily visible emission notations of the S01 stack exhaust and the trailer vents shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
- (f) An inspection shall be performed each calendar quarter of the cyclone controlling the tire buffing operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
- (g) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.
- (h) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the two (2) Cahill KW-30 tire buffers, identified as PO1A and PO1B, and the control devices must operate properly to ensure compliance with 326 IAC 6-1-2(a) (Particulate Rules: Nonattainment Area Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements).

Conclusion

The operation of this tire retreading source shall be subject to the conditions of the Minor Source Operating Permit 097-20528-00320.

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M. Caraher
Date: 05/11/05

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.7

14.9

Emission Factor in lb/MMCF	Pollutant						Highest Single HAP Hexane	Combination HAP
	PM	PM10	SO2	NOx	VOC	CO		
	7.6	7.6	0.6	100.0	5.5	84.0	1.8	1.62E-01
Potential Emission in tons/yr	0.06	0.06	0.00	0.74	0.04	0.63	0.01	0.01

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
VOC Emissions
Tire Grinding and Curing**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M. Caraher
Date: 05/11/05

Tire Grinding

	Tires Ground per day	pounds rubber buffed per tire	VOC emissions factor ¹ (lb / lb)	VOC emissions (tons/ year)
Potential	648	15.41	5.21E-04	0.95

VOC emissions (tons / yr) = tires ground / hr x 24 hrs/day * lbs rubber buffed / tire ground * lb VOC / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr
 based on an hourly tire grinding capacity of: 27 tires per hour

Curing Process

	Tire Cured per day	tire weight (lbs)	VOC emissions factor ¹ (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	VOC emissions (tons/ year)
Potential	648	25	1.18E-03	1.00	0%	3.49

VOC emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs VOC / lb rubber * lb rubber / lb tire * (1-% reduction) * 365 day / yr * 1 ton / 2000 lbs
 (1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Total VOC emissions = 4.44

Appendix A: Emissions Calculations

HAPs Emissions

Tire Grinding and Curing

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M. Caraher
Date: 05/11/05

Tire Grinding

	Tires Ground per day	pounds rubber buffed per tire	HAP emissions factor (lb / lb)	HAP emissions (tons/ year)
Potential	648	15.41	0.00E+00	0.00

HAP emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground * lb HAP / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr

Curing Process

	Tire Cured per day	Tire weight (lbs)	HAP emissions factor (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	HAP emissions (tons/ year)
Potential	648	25	0.00E+00	1.00	0%	0.00

HAP emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs HAP / lb rubber * lb rubber / lb tire * % reduction * 365 day / yr * 1 ton / 2000 lbs

Total HAP emissions = 0.00

**Appendix A: Emissions Calculations
PM Emissions
Grinding, Coating, and Shot Blasting**

**Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M Caraher
Date: 05/11/05**

Tire Grinding: 27 tires per hour

	Tires Ground per day	pounds rubber buffed per tire	PM emissions factor ¹ (lb PM / lb buffed)	PM emissions before controls (tons/ year)	Reduction for water mist	Reduction for Cyclone	PM emissions after controls (tons/ year)	Air flow rate (acfm)	In compliance with 326 IAC 6-1-2(a)? (<0.03 gr/dscf)
Potential	648	15.41	0.50	911.19	NA	NA	NA	NA	NA
Controlled	648	15.41	0.50	911.19	50%	90%	45.56	2127	0.571

PM emissions (tons / yr) (EPA) = tires ground / day * lbs rubber buffed / tire ground * lb PM / lb rubber buffed
* % reduction for water mist * % reduction for cyclone * 1 ton / 2000 lbs * 365 days / yr

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Compliance with 6-1-2(a) = hourly controlled emission rate x 7000 grain/lb x hr/60 min x min/air flow rate

	Tires Ground per day	pounds rubber buffed per tire	PM10 emissions factor ² (lb PM / lb buffed)	PM10 emissions before controls (tons/ year)	Reduction for water mist	Reduction for Cyclone	PM10 emissions after controls (tons/ year)	Air flow rate (acfm)	In compliance with 326 IAC 6-1-2(a)? (<0.03 gr/dscf)
Potential	648	15.41	9.00E-04	3.28	NA	NA	NA	NA	NA
Controlled	648	15.41	9.00E-04	3.28	50%	90%	0.16	2127	NA

PM10 emissions (tons / yr) (EPA) = tires ground / day * lbs rubber buffed / tire ground * lb PM10 / lb rubber buffed

(2) - PM10 Emission factor (0.0009 lb/lb tire buffed after water mist) developed by 9/03/04 OES witnessed stack testing, pre-cyclone control.

Compliance with 6-1-2(a) = hourly controlled emission rate x 7000 grain/lb x hr/60 min x min/air flow rate

Powder Coating

	Rims Coated per day	lbs coating used per rim	PM emissions factor (lb / lb)	transfer efficiency of spray gun	Control Efficiency	PM emissions (tons/ year)	Air flow rate (acfm)	In compliance with 326 IAC 6-1-2(a)? (<0.03 gr/dscf)
Potential	240	1	0.72	30%	0.00%	22.08	NA	NA
Controlled	240	1	0.72	30%	99.70%	0.07	2170	0.001

PM emissions (tons / yr) = rims coated / day * lbs coating / rim * lbs PM / lbs coating

* (1-%transfer efficiency) * (1-control efficiency) * 365 days / yr * 1 ton / 2000 lbs

Compliance with 6-1-2(a) = hourly controlled emission rate x 7000 grain/lb x hr/60 min x min/air flow rate

Shot Blasting

	Rims per day	PM emissions factor (lb / rim)	Control Efficiency	PM emissions (tons/ year)	Air flow rate (acfm)	In compliance with 326 IAC 6-1-2(a)? (<0.03 gr/dscf)
Potential	240	2.67E-01	0.00%	11.69	NA	NA
Controlled	240	2.67E-01	99.00%	0.12	2273	0.001

PM emissions (tons / yr) = rims / day * lbs PM / rim * 1-control efficiency* 365 days / year * 1 ton / 2000 lbs

Compliance with 6-1-2(a) = hourly controlled emission rate x 7000 grain/lb x hr/60 min x min/air flow rate

Total PM emissions = 944.96 (EPA)

**Appendix A: Emissions Calculations
PM and VOC Emissions from Insignificant Facilities**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M. Caraher
Date: 05/11/05

Tread Extruder

- *The maximum production rate is 3.2 tires per hour.
- *The maximum of 25 pounds of tread rubber onto each tire.
- *The emission factor for particulate is 1.23×10^{-5} pounds per pound tread.¹

PTE

$3.2 \text{ tires / hr} * 25 \text{ lbs tread / 1 rim} * 1.23 \times 10^{-5} \text{ lbs PM / lb tread} * 8760 \text{ hrs / yr} * 1 \text{ ton / 2000 lbs} =$
0.004 tons PM per year

Tire Repair

- *The two organic materials used are Fast-Dry Chemical Vulcanizing Cement and Butyl Liner Repair Sealer.
- *The maximum amount of Fast-Dry Chemical Vulcanizing Cement used is 4.7 gallons per year.
- * The density of Fast-Dry Chemical Vulcanizing Cement is 6.255 lbs / gal.
- *The maximum amount of Butyl Liner Repair Sealer used is 9 gallons per year.
- * The density of Butyl Liner Repair Sealer is 12.6 lbs / gal.

PTE

Fast-Dry Chemical Vulcanizing Cement:
 $4.7 \text{ gal / yr} * 6.255 \text{ lbs / gal} * 1 \text{ ton / 2000 lbs} =$
0.014 tons PM per year

Cushion Extruder

- * The maximum production rate is 14.4 tires per hour.
- * The maximum of 3.5 pounds of extruded rubber onto each tire.
- * The emissions factor for VOC is 5.15×10^{-5} pounds per pound tread.¹

PTE

$14.4 \text{ tires / hr} * 3.5 \text{ lbs tread / 1 rim} * 5.15 \times 10^{-5} \text{ lbs VOC / 1 lb tread} * 8760 \text{ hrs / yr} * 1 \text{ ton / 2000 lbs} =$
0.011 tons VOC per year

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

**Appendix A: Emissions Calculations
Summary**

Company Name: Wingfoot Commercial Tire Systems, LLC
Address City IN Zip: 1950 West Edgewood Avenue, Indianapolis, Indiana 46217
Permit Number: 097-20528-00320
Reviewer: M. Caraher
Date: 05/11/05

Sourcewide Potential Emissions (tons / yr)

Emissions Unit	PM	PM10	SO2	NOx	VOC	CO	HAP
NG combustion	0.06	0.06	0.00	0.74	0.04	0.63	0.01
Tire Grinding	911.19	3.28	0.00	0.00	0.95	0.00	0.00
Powder Coating	22.08	22.08	0.00	0.00	0.00	0.00	0.00
Shot Blasting	11.69	11.69	0.00	0.00	0.00	0.00	0.00
Tread Extruder	0.004	0.004	0.00	0.00	0.00	0.00	0.00
Tire Repair	0.014	0.014	0.00	0.00	0.00	0.00	0.00
Cushion Extruder	0.00	0.00	0.00	0.00	0.01	0.00	0.00
Curing	0.00	0.00	0.00	0.00	3.49	0.00	0.00
Total	945.04	37.12	0.00	0.74	4.49	0.63	0.01

Sourcewide Limited Emissions (tons / yr)

Emissions Unit	PM	PM10	SO2	NOx	VOC	CO	HAP
NG combustion	0.06	0.06	0.00	0.74	0.04	0.63	0.01
Tire Grinding	45.56	0.16	0.00	0.00	0.95	0.00	0.00
Powder Coating	0.07	0.07	0.00	0.00	0.00	0.00	0.00
Shot Blasting	0.12	0.12	0.00	0.00	0.00	0.00	0.00
Tread Extruder	0.004	0.004	0.00	0.00	0.00	0.00	0.00
Tire Repair	0.014	0.014	0.00	0.00	0.00	0.00	0.00
Cushion Extruder	0.00	0.00	0.00	0.00	0.011	0.00	0.00
Curing	0.00	0.00	0.00	0.00	3.49	0.00	0.00
Total	45.82	0.42	0.00	0.74	4.49	0.63	0.01