



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 13, 2005
RE: Griffith Rubber Mills / 033-20567-00080
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, 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 eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Mitchell E. Daniels, Jr.
Governor

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October 13, 2005

Mr. Darl Stetzel
Griffith Rubber Mills
400 North Taylor Road
Garrett, Indiana 46738

Re: 033-20567-00080
First Significant Permit Revision to
FESOP 033-17355-00080

Dear Mr. Stetzel:

Griffith Rubber Mills was issued a permit on June 23, 2004 for a stationary custom molded rubber products manufacturing plant. Upon further review, IDEM, OAQ has determined to revise the current FESOP permit to include a limit on the potential to emit of VOC from the entire source and the rubber vulcanization process pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, respectively. Pursuant to the provisions of 326 IAC 2-8-11.1(f), a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of revising Section D.1 of FESOP No. 033-17355-00080, issued June 23, 2004 to include a VOC limit pursuant to 326 IAC 2-8 and 326 IAC 8-1-6 because the potential to emit of VOC from the entire source is greater than 100 tons per year, and greater than 25 tons per year from each of the units under the rubber vulcanization process (three (3) autoclaves and one (1) hot cure line). The VOC emissions from the rubber vulcanization process were originally underestimated because of the use of an incorrect emission factor. By using the correct emission factor for VOC, the potential VOC emissions from the rubber vulcanization process are greater than 25 tons per year, and greater than 100 tons per year from the entire source.

The following conditions are applicable to the proposed project:

1. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
2. All requirements and conditions of this approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.



Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indiana, 46204, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

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



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Griffith Rubber Mills
400 North Taylor Road
Garrett, Indiana 46738**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F033-17355-00080	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 23, 2004 Expiration Date: June 23, 2009
First Significant Permit Revision No.: 033-20567-00080	Pages Affected: 16, 24-26, 28, 38-42
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 13, 2005

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3 and A.4 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 2-8-3(b)]

The Permittee owns and operates a stationary custom molded rubber products manufacturing plant.

Authorized Individual:	Maintenance Manager
Source Address:	400 North Taylor Road, Garrett, Indiana 46738
Mailing Address:	400 North Taylor Road, Garrett, Indiana 46738
General Source Phone:	(260) 357-3130
SIC Code:	3061
County:	DeKalb
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This custom molded rubber products manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 400 North Taylor Road, Garrett, Indiana.
- (b) Plant 2 is located at 507 North Lee Street, Garrett, Indiana.

Since the two (2) plants are located on contiguous properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Plant 1

- (a) One (1) rubber molding operation (consisting of nineteen (19) injection molding presses, thirty-one (31) steam presses, and fourteen (14) hose steam presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.
- (b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. Only one gun is utilized at a time and some of the adhesive products are applied via dipping.
- (c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour, one of the main rubber compounds processed at this location. These units were constructed in 2004.

Plant 2

- (d) One (1) extrusion process I, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (e) One (1) rubber extrusion process II, utilizing two (2) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.
- (f) One (1) rubber mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.
- (g) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.
- (h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) Continental boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 4.548 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.
 - (2) One (1) York Shipley boiler (located at Plant 1), burning natural gas, with a maximum heat input capacity of 3.348 MMBtu per hour and exhausting at stack B1. This unit was installed in 1983.
 - (3) One (1) Columbia boiler (located at Plant 2), burning natural gas, with a maximum heat input capacity of 6.238 MMBtu per hour and exhausting at stack B3. This unit was installed in 1959.
- (b) Degreasing operations (cold cleaner degreaser) that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This unit was constructed in 1981.
- (c) One (1) open top degreaser, with a maximum throughput rate of 0.11 gallon of water-based solvent per hour used to degrease metal inserts. This unit was installed in 2003.
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

- (f) Combustion source flame safety purging on startup.
- (g) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding, buffing equipment, and cutting lines.
- (l) Closed loop heating and cooling systems.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Natural draft cooling towers not regulated under a NESHAP.
- (o) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Filter or coalescer media changeout.
- (v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38⁰ Celsius).
- (w) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including
 - (1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.
 - (2) Post cure electric oven, located at Plant 1.
- (x) Five (5) Hydraulic presses, located at Plant 2.
- (y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.
- (z) Small dribble grinding, located in Plant 1.

- (aa) Small autoclave with a roof exhaust, located in Plant 1.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

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

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

-
- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs), within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; 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 a exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, 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 the "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.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office, 220 W. Colfax Avenue, Ste. 200, South Bend, Indiana, 46601-1634, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Northern Regional Office

Telephone No.: 1-800-753-5519

Telephone No.: 219-245-4870

Facsimile No.: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independently of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC13-30-3-1] [IC 13-17-3-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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 12-30-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 12-30-1, 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 12-30-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable).
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:
Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, 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.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner 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 the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

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(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements in 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 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 is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (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, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility 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 that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any 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 require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant 1

- (a) One (1) rubber molding operation (consisting of nineteen (19) injection molding presses, thirty-one (31) steam presses, and fourteen (14) hose steam presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.
- (b) One (1) adhesive coating booth, using air atomization guns, with a maximum throughput rate of 0.24 gallons per hour, using dry filters as control and exhausting at stack ID PB1. This unit was constructed in 1996. Only one gun is utilized at a time and some of the adhesive products are applied via dipping.
- (c) Two (2) rubber extruding lines (identified as extruder 4 and 5), with a combined maximum throughput rate of 2,000 pounds of EPDM Sulfur Cure per hour, one of the main rubber compounds processed at this location. These units were constructed in 2004.

Plant 2

- (d) One (1) extrusion process I, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3 (part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (e) One (1) rubber extrusion process II, utilizing two (2) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.
- (f) One (1) rubber mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.
- (g) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.
- (h) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants and Volatile Organic Compounds [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the potential to emit from the entire source of VOC, any single HAP and any combination of HAPs shall be limited to less than ninety-nine (99), ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined by the end of each month by using the following equations:

$$(a) \quad E_{\text{voc}} = \left[3 \sum_{n=1}^{12} (E_1 + E_2 + E_3 + E_4 + E_5 + E_6 + E_7)_n \right] < 99 \text{ tons per twelve (12) consecutive month period.}$$

$$(b) \quad E_{\text{combined HAP}} = \frac{12}{n=1} [3 (E1 + E2 + E3 + E4 + E5 + E6 + E7)] < 25 \text{ tons per twelve (12) consecutive month period}$$

$$(c) \quad E_{\text{individual HAP}} = \frac{12}{n=1} [3 (E1 + E2 + E3 + E4 + E5 + E6 + E7)] < 10 \text{ tons per twelve (12) consecutive month period}$$

where:

- E_{VOC} = Actual Emissions of VOC
- E_{combined} = Actual Emissions of any combination of HAPs
- $E_{\text{individual}}$ = Actual Emissions of any single HAP
- E_1 = Actual Emissions from rubber extrusion I
- E_2 = Actual Emissions from rubber extrusion II
- E_3 = Actual Emissions from rubber mixing
- E_4 = Actual Emissions from rubber molding
- E_5 = Actual Emissions from adhesive coating booth
- E_6 = Actual Emissions from ink-jet printing operation
- E_7 = Actual Emissions from splicing operation
- n = compliance period in months

(d) $E_1, E_2, E_3,$ and E_4 will be calculated as follows:

- (A) $E_1 = (MT * E. F)$
- (B) $E_2 = [(MT * E. F)_{\text{Autoclave}} + (MT * E. F)_{\text{Hot Air Cure}}]$
- (C) $E_3 = (MT * E. F)$
- (D) $E_4 = [(MT * E. F)_{\text{Material 1}} + (MT * E. F)_{\text{Material 2}} + (MT * E. F)_{\text{Material 3}}]$

where:

- MT = maximum throughput rate of material used in pounds per hour
- $E. F$ = emission factor in pound of VOC/HAP per pound of material, depending upon which equation is being used.

(e) The emission factors, shown in the table below, shall be used in equations specified in Condition D.1.1(d).

Emission Unit	Material	*Emission Factor (lb VOC per lb material)	*Emission Factor (lb HAP per lb material)
Rubber Extrusion I (E1)	EPDM sulfur cure	3.95E-05	2.99E-05
Rubber Extrusion II (E2)	EPDM sulfur cure-using Autoclave	6.15E-03	6.03E-03
	EPDM sulfur cure-using Hot Cure	1.90E-03	9.76E-04
Rubber Mixing (E3)	EPDM sulfur cure	7.38E-05	5.58E-05
Rubber Molding (E4)	EPDM sulfur cure - Material 1	1.44E-03	1.09E-03
	CRW (Polychloroprene W Type) - Material 2	7.31E-04	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	9.76E-04	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

(f) $E_5, E_6,$ and E_7 shall be calculated based on the total VOC and HAP usage for each compliance period.

Compliance with the above limits renders 326 IAC 2-7 (Part 70 Program) not applicable to the source.

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the rubber mixing facility and five (5) extruders shall not exceed the pounds per hour limit as shown in the table below.

Emission Unit	Process Weight		Particulate Emission Limit (lb/hour)
	(lb/hour)	(ton/hour)	
Rubber Mixing	1350	0.68	3.17
Each of the three (3) Extruders	998.3	0.49	2.57
Each of the two (2) Extruders	1,000	0.50	2.58

The pound per hour limitation was calculated using the following equation:

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

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

(b) Any change or modification that would increase the adhesive usage to equal to or greater than five (5) gallons per day must receive prior approval from IDEM, OAQ.

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the potential VOC emissions from the rubber extrusion process II consisting of two (2) autoclaves and one (1) hot air oven cure line shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits make 326 IAC 8-1-6 not applicable.

D.1.4 VOC [326 IAC 8-3-2] [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-2 (Cold cleaner operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning degreaser constructed after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.1.1 and D.1.3.
- (1) The type of material and its maximum throughput in pounds per hour used in the rubber manufacturing facilities consisting of rubber extrusion I, rubber molding, rubber extrusion II, and rubber mixing.
 - (2) The amount of material and solvent less water used on a monthly basis in the adhesive coating line, printing operation, and splicing operation.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The VOC and HAP usage for each compliance period in the adhesive coating line, printing operation, and splicing operation
 - (4) Records of all calculations required by Condition D.1.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10): Insignificant Activities]

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) One (1) Continental boiler (located in Plant 2), burning natural gas, with a maximum heat input capacity of 4.548 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.
 - (2) One (1) York Shipley boiler (located in Plant 1), burning natural gas, with a maximum heat input capacity of 3.348 MMBtu per hour and exhausting at stack B1. This unit was installed in 1983.
 - (3) One (1) Columbia boiler (located in Plant 2), burning natural gas, with a maximum heat input capacity of 6.238 MMBtu per hour and exhausting at stack B3. This unit was installed in 1959.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3 (d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input. Therefore, the Columbia boiler shall not exceed 0.8 lbs of particulate per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from all facilities used for indirect heating purposes which were existing and in operation after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the York Shipley boiler shall not exceed 0.6 lbs of particulate per MMBtu heat input.

D.2.2 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 4.548 MMBtu per hour heat input boiler shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where P_t = Pounds of particulate matter emitted per million Btu (lb per MMBtu) heat input.
 Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. This unit was constructed in 1981.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

- (k) The following equipment related to manufacturing activities not resulting in the emissions of HAPS: brazing equipment, cutting torches, soldering equipment, welding, buffing equipment, and cutting lines.
- (y) Rubber plant deflashing using liquid nitrogen, located in Plant 1.
- (z) Small dribble grinding, located in Plant 1.
- (aa) Small autoclave with a roof exhaust, located in Plant 1.

(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) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 per hour.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

- (c) One (1) open top degreaser, with a maximum throughput rate of 0.11 gallon of water-based solvent per hour used to degrease metal inserts. This unit was installed in 2003.
- (d) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (e) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (f) Combustion source flame safety purging on startup.
- (g) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (l) Closed loop heating and cooling systems.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Natural draft cooling towers not regulated under a NESHAP.
- (o) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Filter or coalescer media changeout.
- (v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^o Celsius).
- (w) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including
 - (1) Combustion units used for comfort heating with a combined maximum heat input capacity of 1.45 MMBtu per hour.
 - (2) Post cure electric oven, located at Plant 1.
- (x) Five (5) Hydraulic presses, located at Plant 2.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Affidavit (specify)
- 9 Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
XThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
ee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-
llow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
 Source Address: 400 North Taylor Road, Garrett, Indiana 46738
 Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
 FESOP No.: F033-17355-00080
 Facility: Rubber Extrusion I, Rubber Mixing, Rubber Molding, Rubber Extrusion II, Adhesive Coating Booth, Splicing Operation, Ink-jet Printing Operation
 Parameter: A single HAP
 Limit: Less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP	Single HAP	Single HAP
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Extrusion I, Rubber Mixing, Rubber Molding, Rubber Extrusion II, Adhesive Coating Booth, Splicing Operation, Ink-jet Printing Operation
Parameter: Combined HAPs
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Combination of HAPs	Combination of HAPs	Combination of HAPs
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Extrusion I, Rubber Mixing, Rubber Molding, Rubber Extrusion II, Adhesive Coating Booth, Splicing Operation, Ink-jet Printing Operation
Parameter: VOC
Limit: Less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 1 - (Rubber Extrusion Process II)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 2 - (Rubber Extrusion Process II)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Hot Air Cure Oven Line - (Rubber Extrusion Process II)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for a Significant Permit Revision to a
Federally Enforceable State Operating Permit**

Source Background and Description

Source Name:	Griffith Rubber Mills
Source Location:	400 North Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	F033-17355-00080
Operation Permit Issuance Date:	June 23, 2004
Significant Permit Revision No.:	033-20567-00080
Permit Reviewer:	ERG/SD

On April 25, 2005, the Office of Air Quality (OAQ) had a notice published in Auburn Evening Star, Auburn, Indiana, stating that IDEM's Office of Air Quality (OAQ) is modifying the source's existing FESOP No. 033-17355-00080 to include a FESOP limit for VOC emissions under Section D.1 to less than 100 tons per year from the entire source and to less than 25 tons per year from the three (3) autoclaves and one (1) hot air cure oven line under the rubber vulcanization process. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 22, 2005, Griffith Rubber Mills submitted comments on the proposed Significant Permit Revision to the FESOP. The summary of the comments is as follows. (Deleted language appears as strikeouts, new language is bolded). The Table of Contents has been modified to reflect these changes.

Comment 1:

The Permittee commented that the two plants currently permitted under FESOP No.: 033-17355-00080, issued June 23, 2004 are not collocated. The two (2) plants are owned and operated by different entities and are not located on contiguous or adjacent properties because the distance between the boundaries of the two (2) plants are 1.2 miles. Moreover, neither facility acts as a support facility for the other nor is either plant auxiliary to the other. The two (2) plants produce different product lines and do not depend upon the other to exist or operate.

Response to Comment 1:

IDEM, OAQ has thoroughly reviewed the above comment and concluded that no decision shall be made at this time for the two (2) plants. Further action in this regard is beyond the scope of this significant permit revision and shall be handled independently of this revision upon submission of a separate application by the Permittee. No changes were made as a result of this comment.

Comment 2:

The Permittee requested that items (a), (d), (e) and (g) under Section A.3 be revised to correctly describe the emission units and pollution control equipment summary.

- (a) Item (a): The rubber molding operations consists of nineteen (19) injection molding presses, thirty-one (31) steam presses, and fourteen (14) hose steam presses.
- (b) Item (d): The three (3) rubber extruding lines fall under an extrusion process I.
- (c) item (e); The rubber vulcanizing process should be revised to rubber extrusion process II and consists of only two (2) autoclaves and one (1) hot air oven cure.
- (d) Item (g): "Solvent cleaning" operation should be written as a "splicing" operation, and this process does not utilize hand wiping to clean off the solvent residue.

Response to Comment 2:

Based on Permittee's request, items (a), (d), (e) and (g) under Section A.2 (previously A.3) have been revised. Section D.1 has been revised to reflect the above changes as shown below.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Plant 1

- (a) One (1) ~~Rubber Molding operations (consisting of seventeen (17) injection molding presses, thirty-two (32) steam presses, and fourteen (14) compression molding steam presses)~~ **nineteen (19) injection molding presses, thirty-one (31) compression molding steam presses, and fourteen (14) compression/injection blow molding hose steam presses**, with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.

...

Plant 2

- (d) **One (1) extrusion process I, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3 (part of the microwave line))** with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (e) One (1) ~~Rubber Vulcanizing~~ **extrusion process II, utilizing three (3) two (2) autoclaves and one (1) hot air oven cure (part of microwave line)**, with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.

- (f) One (1) ~~R~~rubber ~~M~~mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.

- (g) One (1) ~~solvent cleaning~~ **splicing** operation ~~for cleaning small rubber parts by dipping in toluene followed by hand wiping to clean off the solvent residue,~~ with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant 1

- (a) One (1) ~~R~~rubber ~~M~~molding operations (consisting of ~~seventeen (17)~~ **nineteen (19)** injection molding presses, ~~thirty-two (32)~~ **thirty-one (31)** ~~compression molding~~ **steam** presses, and fourteen (14) ~~compression/injection blow molding~~ **hose steam** presses), with a combined maximum throughput rate of 1,261 pounds of rubber compounds per hour, and exhausting at roof exhaust fans ID RF1 through RF4. These units were constructed in 1996.

...

Plant 2

- (d) **One (1) extrusion process I, utilizing** ~~three (3)~~ rubber extruding lines (identified as extruder 1, 2 and 3 (part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

- (e) One (1) ~~R~~rubber ~~V~~vulcanizing **extrusion process II**, utilizing ~~three (3)~~ **two (2)** autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans ID MW1 and 2. These units were constructed in 2001.

- (f) One (1) ~~R~~rubber ~~M~~mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.

- (g) One (1) ~~solvent cleaning~~ **splicing** operation for cleaning small rubber parts by dipping in toluene ~~followed by hand wiping to clean off the solvent residue~~, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

...

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

D.1.1 Hazardous Air Pollutants and Volatile Organic Compounds [326 IAC 2-8]

- (c)
$$E_{\text{individual HAP}} = \left[\sum_{n=1}^{12} (E_1 + E_2 + E_3 + E_4 + E_5 + E_6 + E_7) \right] < 10 \text{ tons per twelve (12) consecutive month period}$$

where:

- E_{VOC} = Actual Emissions of VOC
- E_{combined} = Actual Emissions of any combination of HAPs
- $E_{\text{individual}}$ = Actual Emissions of any single HAP
- E_1 = Actual Emissions from rubber extrusion I
- E_2 = Actual Emissions from rubber ~~vulcanizing~~ **extrusion II**
- E_3 = Actual Emissions from rubber mixing
- E_4 = Actual Emissions from rubber molding
- E_5 = Actual Emissions from adhesive coating booth
- E_6 = Actual Emissions from ink-jet printing operation

E 7 = Actual Emissions from solvent cleaning **splicing** operation
 n = compliance period in months

- (e) The emission factors, shown in the table below, shall be used in equations specified in Condition D.1.1(d).

Emission Unit	Material	*Emission Factor (lb VOC per lb material)	*Emission Factor (lb HAP per lb material)
Rubber Extrusion I (E1)	EPDM sulfur cure	3.95E-05	2.99E-05
Rubber Vulcanizing Extrusion II (E2)	EPDM sulfur cure-using Autoclave	6.15E-03	6.03E-03
	EPDM sulfur cure-using Hot Cure	1.90E-03	9.76E-04
Rubber Mixing (E3)	EPDM sulfur cure	7.38E-05	5.58E-05
Rubber Molding (E4)	EPDM sulfur cure - Material 1	1.44E-03	1.09E-03
	CRW (Polychloroprene W Type) - Material 2	7.31E-04	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	9.76E-04	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

...

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the potential VOC emissions from the rubber ~~vulcanization~~ **extrusion process II** consisting of ~~three (3)~~ **two (2)** autoclaves and one (1) hot air oven cure line shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits make 326 IAC 8-1-6 not applicable.

...

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.1.1 and D.1.3.
- (1) The type of material and its maximum throughput in pounds per hour used in the rubber manufacturing facilities consisting of rubber ~~vulcanizing~~ **extrusion I**, rubber molding, rubber extrusion **II**, and rubber mixing.

Comment 3:

The Permittee requested to revise the quarterly report forms included in the FESOP to accurately reflect the revisions addressed in comments 1 and 2.

Response to Comment 3:

The quarterly forms included in the permit were revised as shown below.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing ~~Extrusion I~~, Rubber Mixing, Rubber Molding, Rubber Extrusion ~~II~~, Adhesive Coating Booth, Solvent Cleaning ~~Splicing~~ Operation, Ink-jet Printing Operation

...

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 1 - (Rubber Vulcanizing ~~Extrusion Process II~~)

...

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 2 - (Rubber Vulcanizing ~~Extrusion Process II~~)

...

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

FESOP Quarterly Report

Source Name: ~~Griffith Rubber Mills~~
Source Address: ~~400 North Taylor Road, Garrett, Indiana 46738~~
Mailing Address: ~~400 North Taylor Road, Garrett, Indiana 46738~~
FESOP No.: ~~F033-17355-00080~~
Facility: ~~Autoclave 3 - (Rubber Extrusion Process II)~~
Parameter: ~~VOG~~
Limit: ~~Less than twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOG	VOG	VOG
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

~~_____ No deviation occurred in this quarter.~~

~~_____ Deviation/s occurred in this quarter.~~

~~_____ Deviation has been reported on:~~

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Hot Air Cure Oven Line - (Rubber Vulcanizing Extrusion Process II)
...

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements and since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statement from Condition C.1 have been removed.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~**[326 IAC 6-3-2]**

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-5 or 326 IAC 6-8 (formerly 326 IAC 6-1) or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(b)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

2. Condition D.1.2 was revised to delete the reference to 40 CFR, Subpart P.

D.1.2 Particulate ~~[326 IAC 6-3-2]~~**[40 CFR, Subpart P]**

...

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Griffith Rubber Mills
Source Location:	400 North Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	033-17355-00080
Operation Permit Issuance Date:	June 23, 2004
Significant Permit Revision No.:	033-20567-00080
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has determined to revise the current FESOP for Griffith Rubber Mills, (a custom molded rubber products manufacturing plant) to include a limit on the potential to emit of VOC from the entire source and the rubber vulcanization process pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, respectively.

History

Griffith Rubber Mills was issued FESOP No. 033-17355-00080 on June 23, 2004.

On January 21, 2005, Mr. Michael Stonik of Office of Enforcement at IDEM indicated that an incorrect emission factor was used to calculate VOC emissions from the rubber vulcanization process consisting of three (3) autoclaves and one (1) hot air cure oven line. By using the correct emission factor for VOC, the potential VOC emissions from the rubber vulcanization process are greater than 25 tons per year and greater than 100 tons per year from the entire source. However, the actual emissions from these units have never exceeded the 25 tons per year threshold because the Permittee has been complying with FESOP limits for HAPs. However, all VOC emissions are assumed to be equal to HAP emissions. Therefore, the actual VOC emissions from the entire source never exceeded 100 tons per year. IDEM, OAQ has also updated the emission factors used for rubber mixing, rubber molding, and rubber extruders. The current FESOP permit was revised to include a limit on the potential to emit of VOC from the entire source and rubber vulcanization process to less than 100 and 25 tons per year pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, respectively.

Source Definition

Pursuant to FESOP No. 033-17355-00080, issued June 23, 2004, this custom molded rubber products manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 400 North Taylor Road, Garrett, Indiana 46738.
- (b) Plant 2 is located at 507 North Lee Street, Garrett, Indiana 46738.

The two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company.

Existing Approvals

The source was issued FESOP No. F033-17355-00080 on June 23, 2004. No other revisions or modifications have been issued for this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the past FESOP application and verified by the applicant on February 11, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

Potential To Emit of the Revision

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.31
PM10	1.31
SO ₂	0.00
VOC	113
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Carbon Disulphide (EPDM Sulfur Cure)	100.8
TOTAL	100.8

Justification for Revision

This FESOP is being modified through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(11)(a) because a revision to the VOC emission factor for rubber vulcanation process, rubber molding, and rubber extruders triggers a new

applicable requirement (VOC emissions limited pursuant to 326 IAC 2-8 and 326 IAC 8-1-6) for sources under the emissions cap.

Potential to Emit After Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Emission Units	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	NO _x	VOC	CO	HAPs
Natural gas fired boilers	0.47	0.47	0.04	6.19	0.34	5.20	Negligible
Natural gas fired combustion units (space heaters, comfort units, and furnaces)	0.25	0.25	0.02	3.32	0.18	2.79	Negligible
Rubber molding	0.00	0.00	0.00	0.00	2.20 6.15	0.00	The source shall be limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combination of HAPs from the entire source.
Rubber extruders	5.80E-04	5.80E-04	0.0	0.0	0.08 0.86	0.0	
Rubber vulcanizing - Three (3) Autoclaves	0.0	0.0	0.0	0.0	* Less than 25 each	0.0	
Rubber vulcanizing - One (1) Hot Air Cure Oven Line					* Less than 25		
Rubber mixing	1.31	1.31	0.0	0.0	0.09 0.44	0.0	
Adhesive coating booth	0.49	0.49	0.0	0.0	6.94	0.0	
Ink-jet Printing	0.0	0.0	0.0	0.0	1.25	0.0	
Degreasing	0.0	0.0	0.0	0.0	0.05	0.0	
Solvent cleaning	0.0	0.0	0.0	0.0	14.4	0.0	
Total Source Emissions	2.53	2.53	0.06	9.51	37.3 *Less than 99.0	7.97	

* The potential emissions of VOC from the three (3) autoclaves and one (1) hot air cure oven line shall be limited to less than 25 tons per year each pursuant to 326 IAC 8-1-6, and potential emissions of VOC from the entire source shall be limited to less than 99.0 tons per year.

After revising each of the units (three (3) autoclaves and one (1) hot air cure oven line) under the rubber vulcanization process, the potential to emit of the criteria pollutants from the entire source is still less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (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 emissions and NO_x are considered when evaluating the rule applicability relating to the ozone. DeKalb County has been designated as attainment for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) DeKalb County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not in one (1) of the twenty-eight (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.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring are not included for this modification because the Permittee has agreed to continue to operate its source under the provisions of 326 IAC 2-8 (Federally Enforceable State Operating Permit).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this modification.
- (c) This requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Rubber Tire Manufacturing (326 IAC 14) are not included for this modification because the Permittee does not manufacture tires (it manufactures custom molded rubber products used for trucks, cars, air conditioners, farming equipment, school buses, etc.) and operates its source under the provisions of 326 IAC 2-8 (FESOP).
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61, and 40 CFR Part 63) included for this modification.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 program). The Permittee shall operate pursuant to 326 IAC 2-8 (FESOP) which limits the potential to emit of each criteria pollutant to less than 100 tons per year.

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

Griffith Rubber Mills was constructed prior to August 7, 1977 and is not in one (1) of the twenty-eight (28) source categories. At the time the source was constructed, it was a minor source under PSD because the potential to emit of each criteria pollutant before controls was less than the PSD major source threshold of 250 tons per year. The source has been modified several times since its construction (as discussed in the Technical Support Document for FESOP No. 033-17355-00080, issued June 23, 2004). None of the past modifications triggered PSD review and the potential to emit of each criteria pollutants remained below 250 tons per year PSD threshold.

On January 21, 2005, IDEM, Office of Enforcement indicated that an incorrect emission factor was originally used to calculate VOC emissions from the rubber vulcanization process (consisting of three (3) autoclaves and one (1) hot air cure oven line). By using the correct emission factor for VOC, the potential VOC emissions from the rubber vulcanization process are greater than 25 tons per year, and greater than 100 tons per year from the entire source. However, the actual emissions from the entire source never exceeded the 250 tons per year PSD threshold because the Permittee has been complying with FESOP limits for HAPs, and all VOC emissions are assumed to be equal to HAP emissions. IDEM, OAQ has also updated the emission factors used for rubber mixing, rubber molding, and rubber extruders. Therefore, the current FESOP permit was revised to include a limit on the potential to emit of VOC from the entire source and the rubber vulcanization process to less than 100 and 25 tons per year pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, respectively.

After this modification, the source will remain an existing minor source under PSD and the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAPs))

The requirements of 326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAPs)) are not included in this modification because the Permittee shall continue to operate the source under the provisions of 326 IAC 2-8 (FESOP) which limits the potential to emit of HAPs to less than 10 and 25 tons per year for single and combination of HAPs, respectively.

326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))

The potential to emit of a single HAP, any combination of HAPs, and VOC from the entire source are greater than ten (10), twenty-five (25), and one hundred (100) tons per year, respectively. Since the HAP and VOC emissions from the rubber manufacturing facilities vary depending on the amount and type of material being used, a single numerical throughput limit cannot be used. The following equations and emission factors have been included in the permit to limit the HAP and VOC emissions to less than 10 tons per year of single HAP, less than 25 tons per year of combined HAP, and less than 100 tons per year from the entire source:

$$(a) \quad E_{\text{voc}} = \left[\sum_{n=1}^{12} (E_1 + E_2 + E_3 + E_4 + E_5 + E_6 + E_7)_n \right] < 99 \text{ tons per twelve (12) consecutive month period.}$$

$$(b) \quad E_{\text{combined HAP}} = \left[\sum_{n=1}^{12} (E_1 + E_2 + E_3 + E_4 + E_5 + E_6 + E_7)_n \right] < 25 \text{ tons per twelve (12) consecutive month period.}$$

$$(c) \quad E_{\text{individual HAP}} = \left[\sum_{n=1}^{12} (E_1 + E_2 + E_3 + E_4 + E_5 + E_6 + E_7)_n \right] < 10 \text{ tons per twelve (12)}$$

n=1 consecutive month period.

where:

- Evoc = Actual emissions of VOC
- E_{combined HAP} = Actual emissions of any combination of HAPs
- E_{individual HAP} = Actual emissions of any single HAP
- E 1 = Actual emissions from rubber extrusion
- E 2 = Actual emissions from rubber vulcanizing
- E 3 = Actual emissions from rubber mixing
- E 4 = Actual emissions from rubber molding
- E 5 = Actual emissions from adhesive coating booth
- E 6 = Actual emissions from ink-jet printing operation
- E 7 = Actual emissions from solvent cleaning operation
- n = compliance period in months

(d) E1, E2, E3, and E4 will be calculated as follows:

- (A) $E1 = (MT * E. F)$
- (B) $E2 = [(MT * E. F)_{Autoclave} + (MT * E. F)_{Hot Air Cure}]$
- (C) $E3 = (MT * E. F)$
- (D) $E4 = [(MT * E. F)_{Material 1} + (MT * E. F)_{Material 2} + (MT * E. F)_{Material 3}]$

where:

MT = maximum throughput rate of material used in pounds per hour
 E. F = emission factor in pound of VOC/HAP per pound of material, depending upon which equation is being used.

(e) The emission factors shown in the table below shall be used in equations specified in paragraph (d).

Emission Unit	Material	* Emission Factor (lb VOC per lb material)	* Emission Factor (lb HAP per lb material)
Rubber Extrusion (E1)	EPDM Sulfur Cure	3.95E-05	2.99E-05
Rubber Vulcanizing (E2)	EPDM Sulfur Cure - using Autoclave	6.15E-03	6.03E-03
	EPDM Sulfur Cure - using Hot Air Cure Oven	1.90E-03	9.76E-04
Rubber Mixing (E3)	EPDM Sulfur Cure	7.38E-05	5.58E-05
Rubber Molding (E4)	EPDM Sulfur Cure - Material 1	1.44E-03	1.09E-03
	CRW (Polychloroprene W Type) - Material 2	7.31E-04	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	9.76E-04	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

(f) E5, E6, and E7 shall be calculated based on the total VOC and HAP usage for each compliance period.

These limits ensure that emissions from the entire source will be less than ten (10) tons per year for any single HAP, less than twenty-five (25) tons per year for any combination of HAPs, and less than ninety-nine (99) tons per year for VOC. These limits render 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Rubber Molding, Rubber Vulcanizing, Rubber Mixing, Extruders

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the rubber mixing facility and the five (5) rubber extruders shall not exceed the pounds per hour limit as shown in the table below:

Emission Unit	Process Weight		Particulate Emission Limit (lb/hour)
	(tons/hour)	(lb/hour)	
Rubber Mixing	0.68	1,350	3.17
Each of the three (3) Extruders	0.49	998.3	2.57
Each of the two (2) Extruders	0.50	1,000	2.58

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

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

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

Based on potential to emit calculations (shown in Appendix A , page 2 of 5), the particulate emissions from the rubber mixing operation is 0.30 pounds per hour, uncontrolled. Therefore, the Permittee is in compliance with the above limits.

The particulate emissions from the five (5) extruder lines are negligible (See Appendix A, page 6 of 14). Therefore, the Permittee is in compliance with the above limit.

326 IAC 8-1-6 (New Facilities - General Reduction Requirements)

- (a) Although constructed after January 1, 1980, the operation of rubber molding operations, rubber mixing operation and the five (5) rubber extruder lines, results in potential emissions of VOC less than twenty-five (25) tons per year each. Therefore, they are not subject to the requirements of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements).
- (b) The rubber vulcanizing process utilizes three (3) autoclaves and one (1) hot air oven cure (part of the microwave line), all of which were constructed in 2001. Each unit has potential VOC emissions greater than 25 tons per year. However, the actual emissions from these units have never exceeded the 25 tons per year threshold because the Permittee has

been complying with FESOP limits for HAPs, and all VOC emissions are assumed to be equal to HAP emissions. The Permittee has agreed to limit the potential VOC emissions from the rubber vulcanizing process (consisting of three (3) autoclaves and one (1) hot air oven cure (part of the microwave line)) to less than 25 tons per year each as follows: Pursuant to 326 IAC 8-1-6, the potential VOC emissions from the rubber vulcanization process (consisting of three (3) autoclaves and one (1) hot air cure oven line) shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits make 326 IAC 8-1-6 not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as described in FESOP No. 033-17355-00080 issued June 23, 2004.

Proposed Changes

Language with a line through it has been deleted, and bold language has been added.

D.1.1 Hazardous Air Pollutants and Volatile Organic Compounds [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the potential to emit from the entire source of **VOC**, any single HAP and any combination of HAPs shall be limited to less than **ninety-nine (99)**, ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined by the end of each month by using the following equations:

$$(a) \quad E_{\text{voc}} = \left[\sum_{n=1}^{12} (E1 + E2 + E3 + E4 + E5 + E6 + E7)_n \right] < \mathbf{99 \text{ tons per twelve (12) consecutive month period.}}$$

$$(ab) \quad E_{\text{combined HAP}} = \left[\sum_{n=1}^{12} (E1 + E2 + E3 + E4 + E5 + E6 + E7) \right] < 25 \text{ tons per twelve (12) consecutive month period}$$

$$(bc) \quad E_{\text{individual HAP}} = \left[\sum_{n=1}^{12} (E1 + E2 + E3 + E4 + E5 + E6 + E7) \right] < 10 \text{ tons per twelve (12) consecutive month period}$$

where:

E_{VOC} = Actual Emissions of VOC

E combined = Actual Emissions of any combination of HAPs

E individual = Actual Emissions of any single HAP

E 1 = Actual Emissions from rubber extrusion

E 2 = Actual Emissions from rubber vulcanizing

E 3 = Actual Emissions from rubber mixing

E 4 = Actual Emissions from rubber molding

E 5 = Actual Emissions from adhesive coating booth

E 6 = Actual Emissions from ink-jet printing operation

E 7 = Actual Emissions from solvent cleaning operation

n = compliance period in months

(ed) E1, E2, E3, and E4 will be calculated as follows:

(A) $E1 = (MT * E. F)$

(B) $E2 = [(MT * E. F)_{Autoclave} + (MT * E. F)_{Hot Air Cure}]$

(C) $E3 = (MT * E. F)$

(D) $E4 = [(MT * E. F)_{Material 1} + (MT * E. F)_{Material 2} + (MT * E. F)_{Material 3}]$

where:

MT = maximum throughput rate of material used in pounds per hour

E. F = emission factor in pound of **VOC/HAP** per pound of material, **depending upon which equation is being used.**

(de) The emission factors, shown in the table below, shall be used in equations specified in Condition D.1.1(ed).

Emission Unit	Material	*Emission Factor (lb VOC per lb material)	*Emission Factor (lb HAP per lb material)
Rubber Extrusion (E1)	EPDM sulfur cure	3.95E-05	2.99E-05
Rubber Vulcanizing (E2)	EPDM sulfur cure-using Autoclave	6.15E-03	6.03E-03
	EPDM sulfur cure-using Hot Cure	1.90E-03	9.76E-04
Rubber Mixing (E3)	EPDM sulfur cure	7.38E-05	5.58E-05
Rubber Molding (E4)	EPDM sulfur cure - Material 1	1.44E-03	1.09E-03
	CRW (Polychloroprene W Type) - Material 2	7.31E-04	6.68E-04
	CRG (Polychloroprene G Type) - Material 3	9.76E-04	1.36E-03

*Emission factors are from the Rubber Manufacturing Association (RMA), 1994.

(ef) E5, E6, and E7 shall be calculated based on the total **VOC and HAP** usage for each compliance period.

...

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the potential VOC emissions from the rubber vulcanization process consisting of three (3) autoclaves and one (1) hot air cure oven line shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits make 326 IAC 8-1-6 not applicable.

D.1.34 VOC [326 IAC 8-32-2] [326 IAC 8-3-5]

D.1.45 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the **VOC and HAP** emission limits established in Conditions D.1.1 and **D.1.3**.
- (1) The type of material and its maximum throughput in pounds per hour used in the rubber manufacturing facilities consisting of rubber vulcanizing, rubber molding, rubber extrusion, and rubber mixing.
- (2) The amount of material and solvent less water used on a monthly basis in the adhesive coating line, printing operation, and splicing operation.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The **VOC and HAP** usage for each compliance period in the adhesive coating line, printing operation, and splicing operation
- (d4) Records of all calculations required by Condition D.1.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.56 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Upon further review, IDEM, OAQ has decided to make the following changes:

1. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (U.S. EPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, U.S. EPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.23 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [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.

2. The mailing address to IDEM, OAQ has been changed as follows:

100 North Senate Avenue
~~P.O. Box 6015~~
 Indianapolis, Indiana ~~46206-6015~~ **46204**

This change has been made throughout the whole permit.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Rubber Vulcanizing, Rubber Mixing, Rubber Molding, Rubber Extrusion Adhesive Coating Booth, Solvent Cleaning Operation, Ink-jet Printing Operation
Parameter: VOC
Limit: Less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:

Phone:

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 1 - (Rubber Vulcanizing Process)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period,
with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 2 - (Rubber Vulcanizing Process)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period,
 with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Autoclave 3 - (Rubber Vulcanizing Process)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period,
 with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 400 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 400 North Taylor Road, Garrett, Indiana 46738
FESOP No.: F033-17355-00080
Facility: Hot Air Cure Oven Line - (Rubber Vulcanizing Process)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period,
 with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

Conclusion

This permit revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 033-20567-00080.

**Appendix A: Emissions Calculations
VOC and HAP Emissions
From Rubber Molding Operation**

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
SPR to FESOP: 033-20567
Pit ID: 033-00080
Reviewer: ERG/SD
Date: January 26, 2005

PLANT 1

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant/lb rubber)	PTE of VOC (lbs/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant/lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)
Small Autoclave (using EPDM Sulfur Cure)	600	1.44E-03	0.86	3.78	1.09E-03	0.65	2.86
EPDM Sulfur Cure	769	1.44E-03	1.11	4.85	1.09E-03	0.84	3.67
CRW	174	7.31E-04	0.13	0.56	6.68E-04	0.12	0.51
CRG	174	9.76E-04	0.17	0.74	1.36E-03	0.24	1.04
SBR 1502/SBR 1500	144	NA	NA	NA	NA	NA	NA
TOTAL				6.15			8.08

* Emission factors for VOC and HAPs are from Rubber Manufacturers Association (RMA), Table 4.12-8 - Platen Press Curing (1994).

** Materials : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure) - Carbon Disulphide
 CRW (Polychloroprene W Type)
 CRG (Polychloroprene G Type)
 Oil-Extended Styrene-Butadiene (SBR 1502)
 Emulsion Styrene-Butadiene (SBR 1500)

There are no PM/PM10 emissions from the press curing operations.

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)

Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC, HAP and PM/PM10 Emissions
From Rubber Manufacturing Operation Consisting of Five (5) Extruder Lines

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
SPR to FESOP: 033-20567
Plt ID: 033-00080
Reviewer: ERG/SD
Date: January 26, 2005

PLANT 1 and Plant 2

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant/lb rubber)	PTE of VOC (lbs/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant/lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)	* Emission Factor for PM/PM10 (lb pollutant/lb rubber)	PTE of PM/PM10 (lb/hour)	PTE of PM/PM10 (ton/year)
EPDM Sulfur Cure	2995	3.95E-05	0.12	0.52	2.99E-05	8.96E-02	0.39	2.67E-08	8.0E-05	3.50E-04
EPDM Sulfur Cure	2000	3.95E-05	0.08	0.35	2.99E-05	5.98E-02	0.26	2.67E-08	5.3E-05	2.34E-04
TOTAL				0.86			0.65			5.84E-04

* Emission factors for VOC, HAP and PM/PM10 are from Rubber Manufacturers Association (RMA), Table 4.12-6 - Extruder (1994).

** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure) - Carbon Disulphide

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)

Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and HAP Emissions
From Rubber Vulcanizing Operation Consisting of 3 Autoclaves, and 1 Hot Air Cure**

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
SPR to FESOP: 033-20567
Pit ID: 033-00080
Reviewer: ERG/SD
Date: January 26, 2005

PLANT 2

** Material	Unit	Max. Usage Rate (lb/hour)	* Emission Factor for Total VOC (lb pollutant / lb rubber)	PTE of VOC (lb/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant / lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)
EPDM Sulfur Cure	3 Autoclaves	2995	6.15E-03	18.4	80.7	6.03E-03	18.1	79.1
	1 Hot Air Cure	2995	1.90E-03	5.69	24.9	9.76E-04	2.92	12.8
TOTAL					106			91.9

* Emission factors for VOC and HAP are from Rubber Manufacturers Association (RMA), Table 4.12-9 - Autoclave Curing and Table 4.12-10 - Hot Air Cure (1994).

** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure) - Carbon Disulphide

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)

Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC, HAP and PM/PM10 Emissions
From Rubber Mixing Operations**

Company Name: Griffith Rubber Mills
033-20567 400 North Taylor Road, Garrett, Indiana 46738
SPR to FESOP: 033-20567
Plt ID: 033-00080
Reviewer: ERG/SD
Date: January 26, 2005

PLANT 2

** Material	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant / lb rubber)	SO ₂	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant / lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)	* Emission Factor for PM/PM10 (lb pollutant / lb rubber)	PTE of PM/PM10 (lb/hour)	PTE of PM/PM10 (ton/year)
EPDM Sulfur Cure	1350	7.38E-05	0.10	0.44	5.58E-05	0.08	0.33	2.22E-04	0.30	1.31
TOTAL				0.44			0.33			1.31

* Emission factors for VOC, HAP and PM/PM10 are from Rubber Manufacturers Association (RMA), Table 4.12-4 - Internal Mixing & Milling (1994).

** Material : Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure) - Carbon Disulphide

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)

Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Emission Summary**

Company Name: Griffith Rubber Mills
Address: 400 North Taylor Road, Garrett, Indiana 46738
SPR to FESOP: 033-20567
Pit ID: 033-00080
Reviewer: ERG/SD
Date: January 26, 2005

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	SO ₂	NOx	VOC	CO	HAPs	Construction Dates
Rubber Molding					6.15		8.08	1996
Rubber Extruders	5.8E-04	5.8E-04			0.86		0.65	1996 and 2001
Rubber Vulcanizing					106		91.9	2001
Rubber Mixing	1.31	1.31			0.44		0.33	2001
Existing Units	1.21	1.21	0.06	9.51	23.2	7.99	13.5	