



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: May 3, 2006
RE: Nishikawa Standard Company / 003-20844-00229
FROM: Nisha Sizemore
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 03/23/06



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

MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Nishikawa Standard Company
2808 Adams Center Road
Ft. Wayne, Indiana 46803**

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

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

| | |
|---|--|
| Operation Permit No.: MSOP 003-20844-00229 | |
| Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: May 3, 2006 Expiration Date: May 3, 2011 |

TABLE OF CONTENTS

| | | |
|----------|--|-----------|
| A | SOURCE SUMMARY | 4 |
| A.1 | General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary | |
| B | GENERAL CONDITIONS | 6 |
| B.1 | Permit No Defense [IC 13] | |
| B.2 | Definitions | |
| B.3 | Effective Date of the Permit [IC 13-15-5-3] | |
| B.4 | Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)] | |
| B.5 | Modification to Permit [326 IAC 2] | |
| B.6 | Annual Notification [326 IAC 2-6.1-5(a)(5)] | |
| B.7 | Preventive Maintenance Plan [326 IAC 1-6-3] | |
| B.8 | Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6] | |
| B.9 | Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1] | |
| B.10 | Transfer of Ownership or Operation [326 IAC 2-6.1-6] | |
| B.11 | Annual Fee Payment [326 IAC 2-1.1-7] | |
| B.12 | Credible Evidence [326 IAC 1-1-6] | |
| B.13 | Term of Conditions [326 IAC 2-1.1-9.5] | |
| B.14 | Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)] | |
| C | SOURCE OPERATION CONDITIONS | 10 |
| C.1 | Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2] | |
| C.2 | Permit Revocation [326 IAC 2-1.1-9] | |
| C.3 | Opacity [326 IAC 5-1] | |
| C.4 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.5 | Stack Height [326 IAC 1-7] | |
| C.6 | Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M] | |
| | Testing Requirements | |
| C.7 | Performance Testing [326 IAC 3-6] | |
| | Compliance Requirements | |
| C.8 | Compliance Requirements [326 IAC 2-1.1-11] | |
| | Compliance Monitoring Requirements | |
| C.9 | Compliance Monitoring [326 IAC 2-1.1-11] | |
| C.10 | Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63] | |
| C.11 | Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6] | |
| C.12 | Actions Related to Noncompliance Demonstrated by a Stack Test | |
| | Record Keeping and Reporting Requirements | |
| C.13 | Malfunctions Report [326 IAC 1-6-2] | |
| C.14 | General Record Keeping Requirements [326 IAC 2-6.1-5] | |
| C.15 | General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13] | |

D.1 EMISSIONS UNIT OPERATION CONDITIONS – Surface Coating Operations..... 16

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

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

D.1.3 Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1(a)(2)]

Annual Notification 18

Malfunction Report 19

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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source, which is an automotive weather stripping manufacturing process.

Authorized Individual: Plant Manager
Source Address: 2808 Adams Center Road, Ft. Wayne, Indiana 46803
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
General Source Phone: (260) 493 - 7938
SIC Code: 3069
County Location: Allen
Source Location Status: Nonattainment area for 8-hour Ozone
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) An automated appearance coating high volume low pressure (HVLP) spray booth (Civic Mainseal) consisting of one spray gun exhausting at stack A and brush application area (Civic Subseal) used for coating rubber window sealing systems, capacity: 10 grams of coating per minute;
- (b) Extrusion line No. 1 consisting of:
 - (1) Three (3) rubber extruders exhausting internally with a total production capacity of 1,340 total pounds per hour;
 - (2) Four (4) plastic extruders exhausting internally, each with a production capacity of 19.0 pounds per hour;
 - (3) Four (4) natural gas combustion heating units, identified as O-1, O-2, O-3 and O-4, with a total capacity of 0.782 million Btu per hour (MM Btu/hr), exhausting at stacks K, S, N and Q respectively.
- (c) Fifteen (15) natural gas fired space heating units with a combined capacity of 18.85 million Btu per hour (MMBtu/hr);
- (d) One (1) spray booth, identified as GMX, used for coating rubber weather stripping consisting of one manual spray gun, with a capacity of 10 grams of coating per minute, utilizing high volume low pressure (HVLP) spraying and dry filter controls exhausting at stack E;
- (e) Three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping;

- (1) Booth B-1A, identified as SEPA robot, with a capacity of 10 grams of coating per minute, exhausting at stack F,
 - (2) Booth C-1A, identified as Ford, with a capacity of 10 grams of coating per minute, exhausting at stack G, and
 - (3) Booth C-2A, identified as SHJ Slide, with a capacity of 10 grams of coating per minute, exhausting to stack E.
- (f) One (1) surface coating line consisting of the following:
- (1) Fourteen (14) spray guns used for coating rubber, utilizing high volume low pressure (HVLP) spray technology and dry filters for control each with a capacity of 10 grams of coating per minute, exhausting at stack P.
 - (2) Six (6) gas-fired burners, used as heating units, each rated at 86,000 Btu/yr exhausting at stack O.
- (g) One (1) spray line, identified as SNA/SVA line, emission unit F-3, using one (1) robotic spray gun with a maximum usage rate of 10 grams of coating per minute, controlled by filter aiestors, and exhausting at stack R, to coat rubber weather stripping.
- (h) One (1) infra-red electric heater, used in conjunction with one (1) rubber-coating spray line identified as F-3.
- (i) One SDA/SDN surface coating line consisting of the following:
- (1) One electric heater exhausting to stack B; and
 - (2) One (1) robotic high volume low pressure (HVLP) spray gun used to coat rubber, exhausting to stack C, capacity: 10 grams of coating per minute used.
- (j) Five (5) brush applications with a maximum usage of 1 gallon per year, each, used to coat rubber weather stripping.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, M003-20844-00229, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.5 Modification to Permit [326 IAC 2]

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have

access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-6.1-4(a).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

B.13 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.14 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds 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 Permit Revocation [326 IAC 2-1.1-9]

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

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

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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O.
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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).

- (g) **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

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251
no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.8 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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.11 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

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

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

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the 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 when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required

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

- (c) 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 report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMMISIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) An automated appearance coating high volume low pressure (HVLP) spray booth (Civic Mainseal) consisting of one spray gun exhausting at stack A and brush application area (Civic Subseal) used for coating rubber window sealing systems, capacity: 10 grams of coating per minute;
- (b) Extrusion line No. 1 consisting of:
 - (1) Three (3) rubber extruders exhausting internally with a total production capacity of 1,340 total pounds per hour;
 - (2) Four (4) plastic extruders exhausting internally, each with a production capacity of 19.0 pounds per hour;
- (d) One (1) spray booth, identified as GMX, used for coating rubber weather stripping consisting of one manual spray gun, with a capacity of 10 grams of coating per minute, utilizing high volume low pressure (HVLP) spraying and dry filter controls exhausting at stack E;
- (e) Three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping:
 - (1) Booth B-1A, identified as SEPA robot, with a capacity of 10 grams of coating per minute, exhausting at stack F,
 - (2) Booth C-1A, identified as Ford, with a capacity of 10 grams of coating per minute, exhausting at stack G, and
 - (3) Booth C-2A, identified as SHJ Slide, with a capacity of 10 grams of coating per minute, exhausting to stack E.
- (f) One (1) surface rubber-coating line consisting of the following:
 - (1) Fourteen (14) spray guns used for coating rubber, utilizing high volume low pressure (HVLP) spray technology and dry filters for control each with a capacity of 10 grams of coating per minute, exhausting at stack P.
- (g) One (1) spray line, identified as SNA/SVA line, emission unit F-3, using one (1) robotic spray gun with a maximum usage rate of 10 grams of coating per minute, controlled by filter airestors, and exhausting at stack R, to coat rubber weather stripping.
- (i) One SDA/SDN surface coating line consisting of the following:
 - (2) One (1) robotic high volume low pressure (HVLP) spray gun used to coat rubber, exhausting to stack C, capacity: 10 grams of coating per minute.
- (j) Five (5) brush applications with a maximum usage of 1 gallon per year, each, used to coat rubber weather stripping.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the spray coating booths and guns shall be controlled by a dry particulate filter or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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

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

D.1.3 Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1(a)(2)]

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with Condition D.1.1.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

| | |
|----------------------|-----------------------------------|
| Company Name: | Nishikawa Standard Company |
| Address: | 2808 Adams Center |
| City: | Fort Wayne, Indiana 46803 |
| Phone: | (260) 593 - 2156 |
| MSOP #: | 003-20844-00229 |

I hereby certify that Nishikawa Standard Company is still in operation.
 no longer in operation.

I hereby certify that Nishikawa Standard Company is in compliance with the requirements of MSOP **003-20844-00229**.
 not in compliance with the requirements of MSOP **003-20844-00229**.

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

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

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |
| |

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit Renewal

Source Name: Nishikawa Standard Company
Source Location: 2808 Adams Center Road, Ft. Wayne, Indiana 46803
County: Allen
SIC Code: 3069
Operation Permit No.: MSOP 003-20844-00229
Permit Reviewer: Alfred C. Dumauual, Ph.D.

On March 24, 2006, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Nishikawa Standard Co. had applied for a Minor Source Operating Permit Renewal to continue to operate an automotive weather stripping manufacturing 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.

Representatives of Nishikawa Standard Co. submitted the following comments on April 18, 2006. IDEM, OAQ has decided to make the following changes. The TSD will remain as it originally appeared when published. Changes to the permit or TSD that occur after the permit has been published are documented in this addendum (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

Comment 1: Under Section D.1(e)(3), the Emission Unit Descriptions contain a typographical error.

Response to Comment 1: The Emission Unit Description has been revised as follows to correct the typographical error:

- | | |
|-----|---|
| (e) | Three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping: |
| (1) | ... |
| (2) | ... |
| (3) | Booth C-2A, identified as SHJ Slide, with a capacity of 10 grams of coating per minute, exhausting to task stack E. |

Comment 2: Under the Technical Source Document Appendix A (Page 2), Chemtrend, the coating material used in Booth B-1A and Booth C-2A, is incorrectly listed. The correct coating material is F-KWD.

Response to Comment 2: Changes to Appendix A are shown in the appendix A to the addendum of the TSD. The changes to PTE are as follows:

| Pollutant | Potential to Emit (tons/yr) |
|-----------------|-------------------------------|
| PM | 23.43 19.26 |
| PM-10 | 23.43 19.26 |
| SO ₂ | 0.06 |
| VOC | 43.17 30.21 |
| CO | 8.13 |
| NO _x | 9.68 |

| HAPs | Potential to Emit (tons/yr) |
|------------|-----------------------------|
| Single HAP | 0.80 |
| Total | 1.67 |

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

1. On the cover page of the permit, the signature block has been updated to reflect the current Permits Branch Chief.

| | |
|--|--|
| Operation Permit No.: MSOP 003-20844-00229 | |
| Issued by: Paul Dubenetzky, Assistant Commissioner Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: Expiration Date: |

2. Upon further review, IDEM has decided to include the following updates to further address and clarify the permit term and the term of the conditions. This includes the addition of the condition: Term of Conditions [326 IAC 2-1.1-9.5] and changes to the following conditions: Permit Term, Prior Permits Superseded, Termination of Right to Operate, and Permit Renewal. Please note that we have rearranged some of the conditions as well as adding the new one.

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

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

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

B.4 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, M003-20844-00229, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.14 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- 3. Under Section B (General Conditions), Condition B.6 (Annual Notification) was revised to reflect the requirements of 326 IAC 2-6.1-5(a)(5).

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

- ~~(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this~~

permit.

~~(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~

~~(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:~~

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

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

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

4. Under Section B (General Conditions), Condition B.10 (Transfer of Ownership or Operation), the Transfer of Ownership or Operational Control condition in the MSOP has been revised for clarity.

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

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

~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.~~

~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).~~

~~(c) IDEM, OAQ shall issue a revised permit.~~

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

B.10 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-6.1-4(a).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

5. Under Section B (General Conditions), Condition B.13 (Term of Conditions) was added.

B.13 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Plt ID: 003-00229
Reviewer: Alfred C. Dumaul
Date: January 31 2006

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--|-----------------------------|------------------------------------|----------------|-----------------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|---------------------------------|-------------------------------|--------------------------------|------------------------------|---------------------|
| Mainseal Automated Booth | | | | | | | | | | | | | | | | |
| SP 217 | 8.7 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 0.00230 | 360 | 1.90 | 0.91 | 0.75 | 18.04 | 3.29 | 3.15 | 2.62 | 75% |
| Subseal Brush Application | | | | | | | | | | | | | | | | |
| FKA | 6.7 | 90.00% | 0.0% | 90.0% | 0.0% | 4.50% | 0.00033 | 360 | 6.00 | 6.00 | 0.71 | 17.12 | 3.12 | 0.00 | 133.40 | 100% |
| Weather Stripping Booth - three (3) HVLP spray booths | | | | | | | | | | | | | | | | |
| Booth B-1A/Chemtrend F-KWD | 6.84 8.40 | 83.6% 70.83% | 0.0% | 0.0% 1.0% | 0.0% | 14.7% 29.17% | 0.00226 | 117 | 5.72 0.09 | 5.72 0.09 | 4.54 0.02 | 36.29 0.55 | 6.62 0.10 | 1.40 2.41 | 38.90 0.30 | 15% |
| Booth C-1A/Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00341 | 65 | 5.72 | 5.72 | 1.27 | 30.42 | 5.55 | 0.93 | 38.90 | 15% |
| Booth C-2A/Chemtrend F-KWD | 6.84 8.40 | 83.6% 70.83% | 0.0% | 0.0% 1.0% | 0.0% | 14.7% 29.17% | 0.00341 | 65 | 5.72 0.09 | 5.72 0.09 | 4.54 0.02 | 36.42 0.46 | 5.55 0.08 | 0.93 2.02 | 38.90 0.30 | 15% |
| Spray line (F3) w/one (1) robotic spray gun | | | | | | | | | | | | | | | | |
| FP217 | 8.7 | 90.30% | 80.0% | 10.3% | 0.0% | 90.34% | 0.15000 | 1,000 | 0.90 | 0.90 | 0.13 | 3.24 | 0.59 | 0.25 | 1.00 | 55% |
| Rubber Weather Stripping Booth - one (1) HVLP spray booth | | | | | | | | | | | | | | | | |
| Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00013 | 78,500 | 5.72 | 5.72 | 0.06 | 1.40 | 0.26 | 0.05 | 38.90 | 10% |
| Rubber Surface Coating Line - twelve (12) HVLP spray guns | | | | | | | | | | | | | | | | |
| Mix of TW-020A & Emrlaon 8370C* | 9.2 | 21.62% | 0.0% | 21.6% | 0.0% | 0.00% | 1.73097 | 1 | 1.99 | 1.99 | 3.44 | 82.63 | 15.08 | 13.67 | 0.00 | 75% |
| Rubber Surface Coating Line - two (2) HVLP spray guns as of 12/2005 | | | | | | | | | | | | | | | | |
| F-UWG | 8.3 | 72.40% | 52.9% | 19.5% | 0.0% | 27.60% | 0.31880 | 1 | 1.62 | 1.62 | 0.52 | 12.37 | 2.26 | 0.80 | 5.86 | 75% |
| SDA/SDN Coating Line | | | | | | | | | | | | | | | | |
| F-KWD | 8.4 | 70.83% | 69.8% | 1.0% | 0.0% | 29.17% | 0.15900 | 1 | 0.09 | 0.09 | 0.01 | 0.33 | 0.06 | 0.42 | 0.29 | 75% |
| Total Potential Emissions | | | | | | | | | | | 9.68 6.90 | 232.25 165.54 | 42.39 30.21 | 21.29 19.26 | | |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Brush Applications

| Chemical | Station | Potential Usage (gal/yr) | Density (lb/gal) | wt% VOC | wt% Xylene | wt% Toluene | Emission (tons/year) | | |
|---------------|---------|--------------------------|------------------|---------|------------|-------------|----------------------|-------------|-------------|
| | | | | | | | VOC | Xylene | Toluene |
| Chemlock 459X | ba1 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba2 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba3 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba4 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba5 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Total | | | | | | | 0.21 | 0.17 | 0.04 |

Emissions Calculation (tons/year) = Potential Usage (gal/yr) X Density (lb/gal) X wt% VOC X wt%HAP X 1ton/2000lbs

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

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

Source Background and Description

| | |
|--|--|
| Source Name: | Nishikawa Standard Company |
| Source Location: | 2808 Adams Center Road, Ft. Wayne, IN 46803 |
| County: | Allen |
| SIC Code: | 3069 |
| Operation Permit No.: | 003-11924-00229 |
| Operation Permit Issuance Date: | May 23, 2000 |
| Permit Revision (or Renewal) No.: | 003-20844-00229 |
| Permit Reviewer: | Alfred C. Dumauual, Ph.D. |

The Office of Air Quality (OAQ) has reviewed an application from Nishikawa Standard Company relating to the construction and operation of a stationary automotive weather stripping manufacturing process.

Permitted Emission Units and Pollution Control Equipment

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

- (a) An automated appearance coating high volume low pressure (HVLP) spray booth (Civic Mainseal) consisting of one spray gun exhausting at stack A and brush application area (Civic Subseal) used for coating rubber window sealing systems, capacity: 10 grams of coating per minute;
- (b) Extrusion line No. 1 consisting of:
 - (1) Three (3) rubber extruders exhausting internally with a total production capacity of 1,340 total pounds per hour;
 - (2) Four (4) plastic extruders exhausting internally, each with a production capacity of 19.0 pounds per hour;
 - (3) Four (4) natural gas combustion heating units, identified as O-1, O-2, O-3 and O-4, with a total capacity of 0.782 million Btu per hour (MM Btu/hr), exhausting at stacks K, S, N and Q respectively.
- (c) Fifteen (15) natural gas fired space heating units with a combined capacity of 18.85 million Btu per hour (MMBtu/hr);
- (d) One (1) spray booth, identified as GMX, used for coating rubber weather stripping consisting of one manual spray gun, with a capacity of 10 grams of coating per minute, utilizing high volume low pressure (HVLP) spraying and dry filter controls exhausting at stack E;

- (e) Three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping:
 - (1) Booth B-1A, identified as SEPA robot, with a capacity of 10 grams of coating per minute, exhausting at stack F,
 - (2) Booth C-1A, identified as Ford, with a capacity of 10 grams of coating per minute, exhausting at stack G, and
 - (3) Booth C-2A, identified as SHJ Slide, with a capacity of 10 grams of coating per minute, exhausting to stack E.
- (f) One (1) surface coating line consisting of the following:
 - (1) Fourteen (14) spray guns used for coating rubber, utilizing high volume low pressure (HVLP) spray technology and dry filters for control each with a capacity of 10 grams of coating per minute, exhausting at stack P.
 - (2) Six (6) gas-fired burners, used as heating units, each rated at 86,000 Btu/yr exhausting at stack O.
- (g) One (1) spray line, identified as SNA/SVA line, emission unit F-3, using one (1) robotic spray gun with a maximum usage rate of 10 grams of coating per minute, controlled by filter airestors, and exhausting at stack R, to coat rubber weather stripping.
- (h) One (1) infra-red electric heater, used in conjunction with one (1) rubber-coating spray line identified as F-3.
- (i) One SDA/SDN surface coating line consisting of the following:
 - (1) One electric heater exhausting to stack B; and
 - (2) One (1) robotic high volume low pressure (HVLP) spray gun used to coat rubber, exhausting to stack C, capacity: 10 grams of coating per minute used.
- (j) Five (5) brush applications with a maximum usage of 1 gallon per year, each, used to coat rubber weather stripping.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) MSOP No. 003-11924-00229, issued on May 23, 2000; and
- (b) Notice Only Change No. 003-19168-00229, issued June 22, 2004

All terms and conditions of previous permits issued pursuant to permitted programs approved into the state implementation plan (SIP) have been either been incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 25, 2005, with additional information received on January 5, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1 through 5).

Potential to Emit of the Source Before Controls

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

The potential to emit for the entire source based on the previously issued approvals added to the new automated appearance coating spray line and manual application area is:

| Pollutant | Potential to Emit (tons/yr) |
|-----------------|-----------------------------|
| PM | 23.43 |
| PM-10 | 23.43 |
| SO ₂ | 0.06 |
| VOC | 43.17 |
| CO | 8.13 |
| NO _x | 9.68 |

| HAPs | Potential to Emit (tons/yr) |
|------------|-----------------------------|
| Single HAP | 0.80 |
| Total | 1.67 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAP is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Allen County.

| Pollutant | Status |
|-----------------|---------------|
| PM-2.5 | Attainment |
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 1-hr Ozone | Attainment |
| 8-hr Ozone | Nonattainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Allen County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

| Pollutant | Emissions (tons/yr) |
|------------------|---------------------|
| PM | 22.50 |
| PM-10 | 22.50 |
| SO ₂ | 0.06 |
| VOC | 37.62 |
| CO | 8.13 |
| NO _x | 9.68 |
| Single HAP | 0.80 |
| Combination HAPs | 1.67 |

- (a) This existing source is a minor stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not 1 of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 003-20844-00229, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) This source is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63), Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating for Plastic Parts and Products) as the coating surface is primarily rubber material, which does not meet the definition of "plastic" under Subpart PPPP, and this is not a major source of HAPs.

State Rule Applicability – Entire Source

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

This source is not subject to the requirements of 326 IAC 2-2 (PSD) because the potential to emit of all attainment pollutants is less than 250 tons per year.

326 IAC 2-3 Emission Offset

This source is not subject to the requirements of 326 IAC 2-3 Emission Offset because the potential to emit of NO_x is less than 100 tons per year and the potential to emit of VOC is less than 100 tons per year.

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

This source is not a major source of hazardous air pollutants (HAPs). Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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.

State Rule Applicability – Individual Facilities

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

Since there are no sources of indirect heating at this source, the requirements of 326 IAC 6-2 are not applicable.

326 IAC 6-3 (Particulate emissions limitations)

There are no particulate emissions from the extrusion operations. Therefore, these operations not subject to the requirements of 326 IAC 6-3.

326 IAC 6-3-2 (Particulate Emission Limitations, Work practices, and Control Technologies)

Pursuant to 326 IAC 6-3-2 (d), the surface coating facility is subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

There are no facilities at this source with a potential to emit of VOC exceeding 25 (twenty-five) tons per year, therefore the requirements of 326 IAC 8-1-6 do not apply

Conclusion

The operation of this stationary automotive weather stripping manufacturing process shall be subject to the conditions of the **Minor Source Operating Permit 003-20844-00229**.

Appendix A: Emissions Calculations

Summary of the Potential to Emit (tons/year)

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Plt ID: 003-00229
Reviewer: Alfred C. Dumauual
Date: January 31 2006

| Emission Units | Potential To Emit (tons/year) | | | | | | |
|--|-------------------------------|--------------|-----------------|--------------|-------------|-----------------|-------------|
| | PM | PM10 | SO ₂ | VOC | CO | NO _x | Total HAPs |
| Main Seal Automated Booth | 3.15 | 3.15 | 0 | 3.29 | 0 | 0 | 0 |
| Subseal Brush Application | 0 | 0 | 0 | 3.12 | 0 | 0 | 0 |
| Weather Stripping Booth/Booth B-1A & Booth C-1A | 2.96 | 2.96 | 0 | 17.72 | 0 | 0 | 0 |
| Spray Line w/robotic spray gun | 0.25 | 0.25 | 0 | 0.59 | 0 | 0 | 0 |
| Weather Stripping Booth/Chemtrend | 0.05 | 0.05 | 0 | 0.26 | 0 | 0 | 0 |
| Rubber Surface Coating Line (TW-020A-Emrlaon 8370C mix) | 13.67 | 13.67 | 0 | 15.08 | 0 | 0 | 0 |
| Rubber Surface Coating Line (F-UWG) | 2.19 | 2.19 | 0 | 2.12 | 0 | 0 | 0 |
| SDA/SDN Coating Line | 0.42 | 0.42 | 0 | 0.06 | 0 | 0 | 0 |
| Brush Applications | 0 | 0 | 0 | 0.21 | 0 | 0 | 0.21 |
| Rubber & Plastic extrusion | 0 | 0 | 0 | 0.71 | 0 | 0 | 1.46 |
| All gas-fired heaters | 0.74 | 0.74 | 0.06 | 0.01 | 8.13 | 9.68 | 0.00 |
| Total PTE | 23.43 | 23.43 | 0.06 | 43.17 | 8.13 | 9.68 | 1.67 |

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Plt ID: 003-00229
Reviewer: Alfred C. Dumaual
Date: January 31 2006

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Mainseal Automated Booth | | | | | | | | | | | | | | | | |
| SP 217 | 8.7 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 0.00230 | 360 | 1.90 | 0.91 | 0.75 | 18.04 | 3.29 | 3.15 | 2.62 | 75% |
| Subseal Brush Application | | | | | | | | | | | | | | | | |
| FKA | 6.7 | 90.00% | 0.0% | 90.0% | 0.0% | 4.50% | 0.00033 | 360 | 6.00 | 6.00 | 0.71 | 17.12 | 3.12 | 0.00 | 133.40 | 100% |
| Weather Stripping Booth - three (3) HVLP spray booths | | | | | | | | | | | | | | | | |
| Booth B-1A/Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00226 | 117 | 5.72 | 5.72 | 1.51 | 36.29 | 6.62 | 1.10 | 38.90 | 15% |
| Booth C-1A/Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00341 | 65 | 5.72 | 5.72 | 1.27 | 30.42 | 5.55 | 0.93 | 38.90 | 15% |
| Booth C-2A/Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00341 | 65 | 5.72 | 5.72 | 1.27 | 30.42 | 5.55 | 0.93 | 38.90 | 15% |
| Spray line (F3) w/one (1) robotic spray gun | | | | | | | | | | | | | | | | |
| FP217 | 8.7 | 90.30% | 80.0% | 10.3% | 0.0% | 90.34% | 0.15000 | 1.000 | 0.90 | 0.90 | 0.13 | 3.24 | 0.59 | 0.25 | 1.00 | 55% |
| Rubber Weather Stripping Booth - one (1) HVLP spray booth | | | | | | | | | | | | | | | | |
| Chemtrend | 6.8 | 83.60% | 0.0% | 83.6% | 0.0% | 14.70% | 0.00013 | 78.500 | 5.72 | 5.72 | 0.06 | 1.40 | 0.26 | 0.05 | 38.90 | 10% |
| Rubber Surface Coating Line - twelve (12) HVLP spray guns | | | | | | | | | | | | | | | | |
| Mix of TW-020A & Emrlaon 8370C* | 9.2 | 21.62% | 0.0% | 21.6% | 0.0% | 0.00% | 1.73097 | 1 | 1.99 | 1.99 | 3.44 | 82.63 | 15.08 | 13.67 | 0.00 | 75% |
| Rubber Surface Coating Line - two (2) HVLP spray guns as of 12/2005 | | | | | | | | | | | | | | | | |
| F-UWG | 8.3 | 72.40% | 52.9% | 19.5% | 0.0% | 27.60% | 0.31880 | 1 | 1.62 | 1.62 | 0.52 | 12.37 | 2.26 | 0.80 | 5.86 | 75% |
| SDA/SDN Coating Line | | | | | | | | | | | | | | | | |
| F-KWD | 8.4 | 70.83% | 69.8% | 1.0% | 0.0% | 29.17% | 0.15900 | 1 | 0.09 | 0.09 | 0.01 | 0.33 | 0.06 | 0.42 | 0.29 | 75% |
| Total Potential Emissions | | | | | | | | | | | 9.68 | 232.25 | 42.39 | 21.29 | | |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Brush Applications

| Chemical | Station | Potential Usage (gal/yr) | Density (lb/gal) | wt% VOC | wt% Xylene | wt% Toluene | Emission (tons/year) | | |
|---------------|---------|--------------------------|------------------|---------|------------|-------------|----------------------|-------------|-------------|
| | | | | | | | VOC | Xylene | Toluene |
| Chemlock 459X | ba1 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba2 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba3 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba4 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Chemlock 459X | ba5 | 12 | 7.28 | 96.4% | 80.0% | 20.0% | 0.04 | 0.03 | 0.01 |
| Total | | | | | | | 0.21 | 0.17 | 0.04 |

Emissions Calculation (tons/year) = Potential Usage (gal/yr) X Density (lb/gal) X wt% VOC X wt%HAP X 1ton/2000lbs

**Appendix A: Emissions Calculations
VOC and Particulate**

From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Plt ID: 003-00229
Reviewer: Alfred C. Dumauual
Date: January 31 2006

| Emission Unit | # Units | Total Throughput (lbs/hour) | VOC Emission Factor (lbs VOC/lb product)* | Single HAP Emission Factor (lbs HAP/lb product) | Total HAP Emission Factor (lbs HAP/lb product) | VOC Emissions (tons/year) | Single HAP Emissions (tons/year) | Total HAP Emissions (tons/year) |
|------------------------|---------|-----------------------------|---|---|--|---------------------------|----------------------------------|---------------------------------|
| Rubber Extruder | 3 | 446.7 | 5.00E-04 | 4.69E-04 | 1.09E-03 | 0.67 | 0.63 | 1.46 |
| Plastic Extruder | 4 | 19.0 | 5.00E-04 | NA | NA | 0.04 | 0.00 | 0.00 |
| Total Emissions | | | | | | 0.71 | 0.63 | 1.46 |

* = State source emission factor is 1lb/ton resin based on 1997 Wisconsin DNR stack test results, approved by IDEM.

Emission Calculation:

For Rubber Extrusion

PTE (tons/year) = # units X Total Throughput (lbs/hour) X 1.68 lbs VOC/1000 lbs extruded X 24 hrs/day X 365 days/year X 1ton/2000lbs

PTE (tons/year) = # units X Total Throughput (lbs/hour) X 1.09 HAPs/1000 lbs extruded X 24 hrs/day X 365 days/year X 1ton/2000lbs.

PTE (tons/year) = # units X Total Throughput (lbs/hour) X 0.469 lbs Single HAP/1000lbs extruded X 24 hrs/day X 365 days/year X 1ton/2000lbs

For Plastic Extrusion:

PTE (tons/year) = # units X Total Throughput (lbs/hour) X 0.469 lbs Single HAP/1000lbs extruded X 24 hrs/day X 365 days/year X 1ton/2000lbs

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler**

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Plt ID: 003-00229
Reviewer: Alfred C. Dumauual
Date: January 31 2006

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

22.1

193.6

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|----------|----------|-------------|----------|----------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 7.6 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 7.36E-01 | 7.36E-01 | 5.81E-02 | 9.68E+00 | 5.32E-01 | 8.13E+00 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total Heat Capacity is summary of the following: 4 units @ 0.782 MMBtu/hr, 15 units combined for 18.9 MMBtu/hr and 6 units @ 86,000 Btu/hr

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit Number: 003-20844-00229
Pit ID: 003-00229
Reviewer: Alfred C. Dumauual
Date: January 31 2006

| | HAPs - Organics | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential Emission in tons/yr | 2.033E-04 | 1.162E-04 | 7.260E-03 | 1.742E-01 | 3.291E-04 |

| | HAPs - Metals | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential Emission in tons/yr | 4.840E-05 | 1.065E-04 | 1.355E-04 | 3.678E-05 | 2.033E-04 |

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.