



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 18, 2005  
RE: Hoosier Tire & Rubber Corporation / 099-21075-00052  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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-MOD.dot 1/10/05

**May 18, 2005**

Mr. Donald Newton  
Hoosier Tire and Rubber Corporation  
P.O. Box 538  
Lakeville, Indiana 46563

Re: **099-21075**  
Minor Source Modification to:  
Part 70 permit No.: T099-7525-00052

Dear Mr. Newton:

Hoosier Tire and Rubber Corporation was issued Part 70 operating permit T099-7525-00052 on January 22, 2001 for a stationary tire manufacturing operation. An application to modify the source was received on April 5, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) one (1) tire press system, identified as EU8, to be constructed in 2005, and
- (b) one (1) tire press/pad printer system, identified as EU9, to be constructed in 2005.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Scott Fulton or extension (3-5691) or dial (317) 233-5691.

Sincerely,

Original Signed by  
Nisha Sizemore,  
Section Chief,  
Office of Air Quality

Attachments

SDF

cc: File - Marshall County  
Marshall County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Rick Reynolds  
Compliance Data Section  
Administrative and Development

**MINOR SOURCE MODIFICATION  
TO A PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Hoosier Tire & Rubber Corp.  
2307 Pidco Drive  
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to construct subject to the conditions contained herein, the affected units described in this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

First Minor Source Modification No.: 099-21075-00052	
Issued by: Original Signed by Nisha Sizemore, Section Chief, Office of Air Quality	May 18, 2005

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) eight (8) tire curing presses, identified as Process EU2, with a total maximum rate of processing 48 tires per hour;
- (c) one (1) paint spray booth, identified as EU3, for painting/stenciling of tires, using dry filters as overspray control, and exhausting through S/V#1;
- (d) twelve (12) tire curing presses, identified as Process EU4, with a total maximum rate of processing 72 tires per hour;
- (e) one (1) paint spray booth, identified as EU5, for painting/stenciling of tires, using dry filters as overspray control, and exhausting through S/V#9;
- (f) four (4) tire curing presses, identified as Process EU6, with a total maximum rate of processing 24 tires per hour;
- (g) one (1) paint spray booth, identified as EU7, for painting/stenciling of tires, using dry filters as overspray control, and exhausting through S/V#17;
- (i) one (1) tire press system, identified as EU8, to be constructed in 2005; and
- (j) one (1) tire press/pad printer system, identified as EU9, to be constructed in 2005.

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

### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]

- (a) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray emissions paint spray booths shall be controlled by a dry particulate filter. Said control device shall be operated according to the manufacturer's specifications.

- (b) The PM from the paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### D.2.3 Source Single and Combined HAP limits [40 CFR 63, Subpart XXXX]

- (a) The source wide single HAP input shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The source wide combined HAP input shall 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 this limit makes 40 CFR 63, Subpart XXXX not applicable.

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

### **D.2.9 Record Keeping Requirements**

---

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The usage of each material containing HAP for each month;
- (2) The usage of each solvent containing HAP for each month;
- (3) The HAP content of each material and solvent used;
- (4) The total single HAP usage for each month;
- (5) The total combined HAP usage for each month; and
- (6) The weight of the single and combined HAPs emitted for each compliance period.

All records kept shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

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

### **D.2.10 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Part 70 Quarterly Report**

Source Name: Hoosier Tire and Rubber Corporation  
 Source Address: 2307 Pidco Drive, Plymouth, Indiana 46563  
 Mailing Address: P.O. Box 538, Lakeville, IN 46563  
 Part 70 Permit No.: T099-7525-00052  
 Facilities: Source HAP emission points  
 Parameter: Material and solvent input HAP  
 Limit: Worst case single and combined HAP less than 10 and 25 tons per consecutive twelve (12) month period, respectively.

YEAR: \_\_\_\_\_

**Single HAP:**

Month		(Column 1) Single HAP This Month	(Column 2) Single HAP From Previous 11 Months	(Column 1 + Column 2) Single HAP For 12 Month Period
1	Xylene			
	Toluene			
	Cyclohexane			
	Ethylbenzene			
2	Xylene			
	Toluene			
	Cyclohexane			
	Ethylbenzene			
3	Xylene			
	Toluene			
	Cyclohexane			
	Ethylbenzene			

**Combined HAP:**

Month	(Column 1) Combined HAP This Month	(Column 2) Combined HAP From Previous 11 Months	(Column 1 + Column 2) Combined HAP For 12 Month Period
1			
2			
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

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

#### Source Background and Description:

Source Name:	Hoosier Tire and Rubber Corporation
Source Location:	2307 Pidco Drive, Plymouth, Indiana 46563
County:	Marshall
SIC Code:	3011
Operation Permit No.:	T099-7525-00052
Date Issued:	January 22, 2001
Minor Source Modification No.:	099-21075-00052
Significant Permit Modification No.:	099-21235-00052
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Hoosier Tire and Rubber Corporation requesting changes to their existing stationary tire manufacturing operation.

Specifically, Hoosier Tire and Rubber Corporation has submitted a request to construct and operate:

- (a) one (1) tire press system, identified as EU8, to be constructed in 2005, and
- (b) one (1) tire press/pad printer system, identified as EU9, to be constructed in 2005.

#### Insignificant Activities

There are no insignificant activities associated with the proposed modification.

#### Existing Approvals

The source has been operating under Part 70 permit 099-7525-00052, issued on January 22, 2001.

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions. Unless otherwise stated, information used in this review was derived from the application and additional information submitted.

#### Emission Calculations

The proposed tire press systems (EU8 and EU9) will generate VOC and HAP emissions and allow an increase in the PM, PM10, VOC, and HAP emissions from existing surface coating booths EU3, EU5, and EU7 due to the increased number of tires from the proposed presses being coated in the booths. The addition of the proposed presses will not affect the existing mixing process production or emissions because the rubber mix that will be used at the proposed presses will not come from the existing mixing process, but from an outside source. The proposed presses will not affect any of the other emission units of the source.

The following calculations determine the unrestricted potential emissions due to the proposed changes and the estimated emissions after controls.

**Unrestricted Potential Emissions:**

(a) EU8:

The tires of press system EU8 will first be pressed and processed through various hand application methods. After processing, the tires will then be routed to either existing surface coating booth EU3, EU5, or EU7, where white tire paint A will be spray applied. After the surface coating booths, the tires will then be prepped and packaged for shipping.

The emissions generated by adding press system EU8 are the VOC and HAP emissions generated by the proposed tire system itself and the PM, PM10, VOC, and HAP emissions generated by the increase in amount of coatings applied at existing spray booths EU3, EU5, and EU7.

The following calculations determine the unrestricted potential emissions generated by adding proposed press system EU8 based on the worst case raw material combination, material properties obtained from the Material Safety Data Sheets (MSDS), the maximum material usage rate in gallons per hour, a transfer efficiency of 65%, emissions before controls, and 8760 hours of operation.

(1) PM/PM10 (EU3, EU5, EU7):

$$\text{lb/gal} * \text{gal/hr} * (1 - \text{wt frac. volatiles}) * (1 - \text{frac. transfer}) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons PM(PM10)/yr}$$

Coating	lb/gal	gal/hr	wt fraction volatiles	fraction transfer	tons PM/yr	tons PM10/yr*
White Tire Paint A	8.62	0.06	0.67	0.65	<b>0.26</b>	<b>0.26</b>

\* PM10 is determined to be equal to PM

(2) VOC (EU3, EU5, EU7, EU8):

$$\text{lb/gal} * \text{gal/hr} * \text{fraction VOC} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons VOC/yr}$$

Material	lb/gal	gal/hr	wt fraction volatiles	tons VOC/yr
Mold Release	6.42	0.0115	0.99	0.320
Tread White Center Line	7.44	0.0003	0.73	0.007
Tread White Letter	6.92	0.0001	0.84	0.003
White Tire Paint A	8.62	0.0615	0.67	1.556
Tread Cement	5.95	0.1920	0.96	4.804
Calendar Splice Cement	6.14	0.0010	0.60	0.016
Solvent	5.92	0.2729	1.00	7.076
<b>Total</b>				<b>13.78</b>

(3) HAP (EU3, EU5, EU7, EU8):

$$\text{lb HAP/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ tons HAP/lb HAP} = \text{tons HAP/yr}$$

HAP	lb/hr	tons/yr
Xylene	0.22	0.96
Toluene	0.003	0.01
Cyclohexane	1.57E-5	neg.
Ethyl Benzene	1.84E-6	neg.
<b>Total</b>		<b>0.97</b>

(c) EU9:

The tires of press system EU9 will first be pressed and then processed through pad printing and various hand application methods. After processing, the tires will then be prepped and packaged for shipping. None of the tires from press system EU9 will go to surface coating booths EU3, EU5, and EU7. Therefore, the emissions generated by adding press system EU9 are the VOC and HAP emissions generated by the proposed tire system itself.

The following calculations determine the unrestricted potential emissions generated by proposed press system EU9 based on the worst case raw material combination, material properties obtained from the Material Safety Data Sheets (MSDS), the maximum material usage rate in gallons per hour, emissions before controls, and 8760 hours of operation.

(1) VOC (EU9):

$$\text{lb/gal} * \text{gal/hr} * \text{fraction VOC} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons VOC/yr}$$

Coating	lb/gal	gal/hr	wt fraction volatiles	tons VOC/yr
Mold Release	6.42	0.0072	0.99	0.200
Tread White Center Line	7.44	0.0002	0.73	0.005
Tread White Letter	6.92	0.0001	0.84	0.003
Tread Cement	5.95	0.1200	0.96	3.002
Calendar Splice Cement	6.14	0.0006	0.60	0.010
Solvent	5.92	0.1705	1.00	4.421
Pad Ink	8.37	0.0070	0.60	0.154
Pad Adhesive Wipe	7.53	0.0116	0.98	0.375
Pad Hardener	9.71	0.0061	0.30	0.078
Pad Fast Thinner	7.26	0.0050	1.00	0.159
Pad Medium Thinner	7.56	0.0133	1.00	0.440
Pad Thinner	8.04	0.0058	1.00	0.204
<b>Total</b>				<b>9.05</b>

(2) HAP (EU9):

$$\text{lb HAP/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ tons HAP/lb HAP} = \text{tons HAP/yr}$$

HAP	lb/hr	tons/yr
Xylene	0.01	0.04
Toluene	0.06	0.26
Cyclohexane	1.59E-4	neg.
Ethyl Benzene	1.67E-5	neg.
<b>Total</b>		<b>0.30</b>

Total UPTE:

The total UPTE due to the modification is the sum of the EU8 and EU9 UPTE.

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
EU8	0.26	0.26	-	-	13.78	-
EU9	-	-	-	-	9.05	-
<b>Total</b>	<b>0.26</b>	<b>0.26</b>	-	-	<b>22.83</b>	-

HAP	EU8	EU9	HAP Emissions (tons/yr)
Xylene	0.96	0.04	<b>1.00</b>
Toluene	0.01	0.26	0.27
Cyclohexane	neg.	neg.	neg.
Ethylbenzene	neg.	neg.	neg.
<b>Total</b>			<b>1.27</b>

**Emissions After Controls:**

The PM and PM10 overspray emissions associated with tire system EU8 are controlled by the dry filter systems of existing surface coating booths EU3, EU5, and EU7 with an overall control efficiency of 99%.

The following calculations determine the PM and PM10 emissions after controls based on the overall control efficiency of 99% and the estimated emissions before controls.

$$\text{EU8:} \quad (1 - 0.99) * 0.26 \text{ tons PM(PM10)/yr} = 0.003 \text{ tons PM(PM10)}$$

All of the other pollutant emissions are uncontrolled. The following table lists the emissions after controls due to the modification.

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
EU8	0.003	0.003	-	-	13.78	-
EU9	-	-	-	-	9.05	-
<b>Total</b>	<b>0.003</b>	<b>0.003</b>	<b>-</b>	<b>-</b>	<b>22.83</b>	<b>-</b>

HAP	EU8	EU9	HAP Emissions (tons/yr)
Xylene	0.96	0.04	<b>1.00</b>
Toluene	0.01	0.26	0.27
Cyclohexane	neg.	neg.	neg.
Ethylbenzene	neg.	neg.	neg.
<b>Total</b>			<b>1.27</b>

**Potential To Emit**

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 due to the proposed changes. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.26
PM-10	0.26
SO <sub>2</sub>	-
VOC	22.83
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Worst case Single HAP	1.00
<b>TOTAL</b>	<b>1.27</b>

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 10 tons per year, but less than 25 tons per year and the source single and combined HAP emissions are being limited to less than their respective applicable levels of 10 and 25 tons per year.

Therefore, the proposed changes shall be permitted via a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(3)(B)(iii) and 326 IAC 2-7-10.5(d)(4)(A) which state that modifications with VOC PTE greater than or equal to 10 tons per year but less than 25 tons per year and have usage limits which limit the single and combined HAP potential to emit to less than their respective major source levels of 10 and 25 tons per year, may be permitted via a Minor Source Modification.

(b) The proposed changes are also:

- (1) not any of the administrative changes listed 326 IAC 2-7-11, and
- (2) the Permittee is seeking to establish a Part 70 permit condition which limits the HAP emissions to avoid being subject to National Emission Standards for Hazardous Air Pollutant (NESHAP) requirements under Title I of the Clean Air Act, which, pursuant to 326 IAC 2-7-12(b)(1)(D)(i) cannot be accomplished via a Minor Permit Modification.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via a Significant Permit Modification pursuant to 326 IAC 2-7-12(d) which states proposed changes which do not qualify for an Administrative Amendment pursuant to 326 IAC 2-7-11 or a Minor Permit Modification pursuant to 326 IAC 2-7-12(b), shall be incorporated into the existing source Part 70 permit via a Significant Permit Modification.

(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 emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
PM <sub>2.5</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
1-hour Ozone	attainment or unclassifiable
8-hour Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions.
- (c) Marshall County has been classified as attainment or unclassifiable for all of the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Existing Source Emissions

Existing PSD source definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited, as obtained from the Technical Support Document (TSD) of Part 70 permit 099-7525-00052, issued on January 22, 2001):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Existing Source	79.9	80.4	0.1	9.2	55.7	0.2	35.9	38.3

PSD Thresholds	250	250	250	250	250	250	-	-
----------------	-----	-----	-----	-----	-----	-----	---	---

This existing source is not a PSD major source because none of the source criteria pollutant emissions exceed the major source level of 250 tons per year.

### Potential to Emit After Issuance

The table below summarizes the source potential to emit after the proposed changes, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Minor Source Modification and Significant Permit Modification.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	79.9	80.4	0.1	9.2	55.7	0.2	-	-
Proposed Changes	0.003	0.003	-	-	22.83	-	<10 <sup>(a)</sup>	<25 <sup>(a)</sup>
<b>Total</b>	<b>79.9</b>	<b>80.4</b>	<b>0.1</b>	<b>9.2</b>	<b>78.53</b>	<b>0.2</b>	<b>&lt;10</b>	<b>&lt;25</b>

PSD Thresholds	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source has agreed to limit the single and combined HAP emissions to less than their respective major source levels of 10 and 25 tons per year to avoid the NESHAP requirements of 40 CFR 63, Subpart XXXX.
- (b) The source after the proposed modification is not a 326 IAC 2-2 major PSD stationary source because none of the criteria pollutant emissions exceed their respective applicable major source levels and the source is not one of the 28 listed source categories.
- (c) Even though no criteria pollutant emissions exceed the Part 70 major source level of 100 tons per year and the source single and combined HAP emissions are now limited to less than their respective major source levels of 10 and 25 tons per year, the source after the proposed modification will still be considered a Title V major stationary source because the source has stated that they wish to maintain their Part 70 permit status.

### **Federal Rule Applicability**

**(a) 40 CFR 60, Subpart BBB, Standards of Performance for the Rubber Tire Manufacturing Industry (60.540 - 60.548):**

Pursuant to 60.540, the provisions of this subpart apply to each of the listed affected facilities in rubber tire manufacturing plants that commence construction, modification, or reconstruction after January 20, 1983.

Pursuant to 40 CFR 60.541(a), a tire is defined as any agricultural, airplane industrial, mobile home, light duty truck and/or passenger vehicle tire that has a bead diameter less than or equal to 0.5 meter (m) (19.7 inches) and a cross section dimension less than or equal to 0.325 m (12.8 inches), and that is mass produced in an assembly line fashion.

None of the tires produced by Hoosier are "mass produced in an assembly line fashion". Each of Hoosier's tires are produced in small batch lots of typically 48 to 122 tires per lot. Each tire is hand built and each lot is unique and identified with a mold and control number.

Therefore, since the tires are not mass produced in an assembly line fashion, the requirements of 40 CFR 60, Subpart BBB do not apply.

**(b) 40 CFR 63, Subpart XXXX, Standards of Performance for Hazardous Air Pollutants: Rubber Tire Manufacturing (63.5980 - 63.6015):**

Hoosier Tire and Rubber Corporation is a rubber tire manufacturing operation for the purposes of this subpart as defined in 63.5981. However, the requirements of 40 CFR 63, Subpart XXXX do not apply because the source is limiting the single and combined HAP emissions to less than their respective major source levels of 10 and 25 tons per year

**(c) 40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products (63.4880 - 63.4581):**

Existing surface coating booths EU3, EU5, and EU7 are not subject to the requirements of 40 CFR 63, Subpart PPPP because the source is limiting the single and combined HAP emissions to less than their respective major source levels of 10 and 25 tons per year to avoid the requirements of 40 CFR 63, Subpart XXXX.

### **State Rule Applicability - Entire Source**

**(a) 326 IAC 2-2:**

The major source requirements of 326 IAC 2-2 do not apply to the proposed tire press systems because the attainment pollutant emission rates are lower than their respective PSD thresholds.

**(b) 326 IAC 4:**

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 4.

**(c) 326 IAC 5:**

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 5.

**(d) 326 IAC 6-4:**

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 6-4.

**State Rule Applicability - Individual Facilities**

**(a) 326 IAC 2-4.1:**

The proposed modification is not subject to the MACT requirements of 326 IAC 2-4.1 because the source single and combined HAP emissions will be limited to less than the applicable major source levels of 10 and 25 tons per year.

**(c) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing Requirements):**

Pursuant to 326 IAC 8-5-4(a), this section applies to sources manufacturing pneumatic rubber, passenger type tires on a mass production basis.

None of the tires produced by Hoosier are "mass produced in an assembly line fashion". Each of Hoosier's tires are produced in small batch lots of typically 48 to 122 tires per lot. Each tire is hand built and each lot is unique and identified with a mold and control number.

Therefore, since the tires are not mass produced in an assembly line fashion, the requirements of 326 IAC 8-5-4 do not apply.

**(d) 326 IAC 8-1-6 (New Facilities, General Reduction Requirements):**

The requirements of 326 IAC 8-1-6 do not apply to the proposed tire presses because the combined potential VOC emissions (22.83 tons per year) are less than the applicable level of 25 tons per year.

**Changes**

In order to incorporate the proposed changes into the existing source permit, the following changes shall be made. All added language is indicated in bold type. All deleted language is struck-out.

**(a) Condition A.1:**

Condition A.1 shall be changed as follows to change the identify the source as minor for Part 70 purposes.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary tire manufacturing plant.

Responsible Official:	Donald Newton
Source Address:	2307 Pidco Drive, Plymouth, IN 46563
Mailing Address:	P.O. Box 538, Lakeville, Indiana 46536
SIC Code:	3011
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
~~Major~~ **Minor** Source, Section 112 of the Clean Air Act

**(b) Condition A.2:**

Condition A.2 shall be changed as follows to include the descriptions associated with the proposed tire presses.

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

---

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

- (a) rubber mixing facility, identified as EU1 for mixing of raw materials, started operation in May of 1984, with a maximum processing rate of 3000 pounds per hour, with particulate matter emissions controlled by two (2) baghouses, identified as DC-1 and DC-2;  
.....
- (g) one (1) paint spray booth, identified as EU7, constructed in January of 2000, for painting/stenciling of tires, using dry filters as overspray control, and exhausting through S/V#17; ~~and~~
- (h) one (1) natural gas fired boiler, rated at 10.46 million British thermal units (MMBtu) per hour, constructed in 1999, and exhausting through one stack identified as S/V#20-;
- (i) one (1) tire press system, identified as EU8, to be constructed in 2005; and**
- (j) one (1) tire press/pad printer system, identified as EU9, to be constructed in 2005.**

**(c) Unit Description of Section D.2:**

The unit description of Section D.2 shall be changed as follows to include the descriptions of the proposed presses.

<p><b>Facility Description [326 IAC 2-7-5(15)]:</b></p> <ul style="list-style-type: none"><li>(b) eight (8) tire curing presses, identified as Process EU2, with a total maximum rate of processing 48 tires per hour;.....</li><li>(f) four (4) tire curing presses, identified as Process EU6, with a total maximum rate of processing 24 tires per hour; <del>and</del></li><li>(g) one (1) paint spray booth, identified as EU7, for painting/stenciling of tires, using dry filters as overspray control, and exhausting through S/V#17-;</li><li><b>(i) one (1) tire press system, identified as EU8, to be constructed in 2005; and</b></li><li><b>(j) one (1) tire press/pad printer system, identified as EU9, to be constructed in 2005.</b></li></ul> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>
--

**(d) Condition D.2.1:**

The proposed tire presses will affect the surface coating booth PM overspray emissions.

The existing paint spray booths are subject to the new requirements of 326 IAC 6-3-2 because the surface coating booths generate particulate matter emissions, the booths are not subject to any of the exemptions listed in 326 IAC 6-3-1(b), and no limitations are established in any of the determinations listed in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2(d), surface coating, reinforced plastics composites manufacturing processes, and graphic arts manufacturing processes, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with the manufacturer's specifications.

The requirements of 326 IAC 6-3-2(d)(2) do not apply to the existing booths because pursuant to 326 IAC 6-3-2(d)(3)(A), sources that operate according to a valid permit pursuant to 326 IAC 2-7 are not subject to the requirements of 326 IAC 6-3-2(d)(2).

Therefore, Condition D.2.1 shall be changed as follows to include the requirements associated with the most recent version of the rule as well as the existing 326 IAC 6-3-2 requirements.

**D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]**

---

**(a) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray emissions paint spray booths shall be controlled by a dry particulate filter. Said control device shall be operated according to the manufacturer's specifications.**

**(b) The PM from the paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:**

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**(e) New Condition D.2.3:**

New Condition D.2.3 shall be changed as follows to include the new source single and combined HAP limits.

**D.2.3 Source Single and Combined HAP limits [40 CFR 63, Subpart XXXX]**

---

**(a) The source wide single HAP input shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

**(b) The source wide combined HAP input shall 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 this limit makes 40 CFR 63, Subpart XXXX not applicable.**

**(f) Condition D.2.8:**

Condition D.2.8 (now Condition D.2.9) shall be changed as follows to include the new record keeping requirements associated with the new single and combined HAP limits. Part (b) of Condition D.2.8 (now Condition D.2.9) shall be changed to only reference the training program of Condition D.2.7 (now Condition D.2.8) because the requirements apply to the training program, not the dry filter operating requirements of Condition D.2.6 (now Condition D.2.7).

**D.2.89 Record Keeping Requirements**

---

(a) To document compliance with Conditions D.2.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2. ....

**(b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

- (1) The usage of each material containing HAP for each month;**
- (2) The usage of each solvent containing HAP for each month;**
- (3) The HAP content of each material and solvent used;**
- (4) The total single HAP usage for each month;**
- (5) The total combined HAP usage for each month; and**
- (6) The weight of the single and combined HAPs emitted for each compliance period.**

**All records kept shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

- (bc) To document compliance with Conditions ~~D.2.6 and D.2.78~~, the Permittee shall maintain a log of operator training program, training records, annual refresher training, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**(g) Condition D.2.9:**

Condition D.2.9 (now Condition D.2.10) shall be changed as follows to include the new reporting requirements associated with the new single and combined HAP limits.

**D.2.910 Reporting Requirements**

---

A quarterly summary of the information to document compliance with ~~condition~~ **conditions D.2.2(a) and D.2.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**(h) Condition Renumbering:**

All conditions of Section D.2 shall be renumbered accordingly to reflect the changes that have been made to the section.

**(i) Reporting Form:**

A new reporting form shall be added to provide the form necessary to document compliance with the new single and combined HAP limits.

**(j) Table of Contents:**

The Table of Contents shall be changed to reflect the changes that have been made under this modification.

**Conclusion**

The proposed tire presses shall be installed and operated according to requirements of Operating Permit T099-7525-00052, issued on January 22, 2001, the requirements specified in Minor Source Modification 099-21075-00052, and Significant Permit Modification 099-21235-00052.