INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 13, 2005

RE: Freudenberg- NOK General Partnership / 143-21240-00010

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05

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

Freudenberg – NOK General Partnership
821 South Lake Road
Scottsburg, Indiana 47170

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F143-21240-00010	
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 13, 2005 Expiration Date: October 13, 2010

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary rubber parts manufacturing plant.

Authorized individual:	Lead Center Manager
Source Address:	821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address:	821 South Lake Road, Scottsburg, Indiana 47170
General Source Phone:	(812) 752-4232
SIC Code:	3053, 3089
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

(a) One (1) rubber mixer, identified as MIX1, constructed in 1986, with a maximum throughput rate of 1,180 pounds of rubber per hour, with emissions controlled by one (1) baghouse which exhausts through stack MIX1.

(b) One (1) rubber mixer, identified as MIX2, constructed in 2001, with a maximum throughput rate of 2,000 pounds of rubber per hour, with emissions controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B, respectively.

(c) One (1) electric rubber post-cure oven, identified as RC-4, constructed in 1994, with a maximum throughput rate of 240 pounds of rubber per hour, and emissions exhausting through stack RC4.

(d) One (1) electric rubber post-cure oven, identified as RC-5, constructed in 2000, with a maximum throughput rate of 240 pounds of rubber per hour, and emissions exhausting through stack RC5.

(e) One (1) rubber ingredient weighing and loading operation, with a total maximum throughput rate of 3,180 pounds of rubber per hour, and consisting of the following:

(1) Three (3) automatic carbon black loading systems, exhausting into the building.

(2) Two (2) manual weighing stations, controlled by one (1) baghouse which exhausts through stack MIX1.

(3) One (1) manual weighing station, controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including twenty-seven (27) units, and with total maximum heat input capacity of 23.0 MMBtu/hr.

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids, including two (2) hydraulic oil tanks.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6, including one (1) standard parts washer and one (1) bench-top parts washer. [326 IAC 8-3-2]

(f) Closed loop heating and cooling systems.

(g) Groundwater oil recovery wells.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Heat exchanger cleaning and repair.

(l) Process vessel degassing and cleaning to prepare for internal repairs.

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically, there are six (6) gritblasters, consisting of the following [326 IAC 2-8-4][326 IAC 2-2][326 IAC 6-3-2]:

(1) One (1) metal casing gritblaster, identified as #52047001, constructed in 2004, with a maximum throughput capacity of 240 pounds of metal parts per hour, with emissions controlled by a dust collector which exhausts inside the building.

(2) One (1) mold cleaning gritblaster, identified as #52966015, constructed in 1981, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(3) One (1) mold cleaning gritblaster, identified as #52016017, constructed in 2001, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(4) One (1) mold cleaning gritblaster, identified as #52966059, constructed in 1991, with a maximum throughput capacity of 15,000 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(5) One (1) mold cleaning gritblaster, identified as #52046018, constructed in 2004, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(6) One (1) mold cleaning gritblaster, identified as #52016022, constructed in 2001, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(s) Filter or coalescer media changeout.

(t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(u) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(v) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) Three (3) rubber warm-up mills, each with a maximum throughput rate of 206 pounds of rubber per hour.

(2) Five (5) rubber extruders, with a total maximum throughput rate of 2,748 pounds of rubber per hour.

(3) One hundred and thirty three (133) rubber molding presses, with a total maximum throughput rate of 2,311 pounds of rubber per hour. [326 IAC 2-8-4]

(4) Three (3) adhesive application booths, each with a maximum capacity of 10,300 metal parts per hour.

(5) One (1) rubber sheet cooling carousel, with a maximum throughput rate of 2,000 pounds of rubber per hour.

(6) Eight (8) plastic presses.

(7) Three (3) electric plastic cure ovens.

(8) One (1) molycote tumbler for small rubber parts.

(9) Six (6) phosphating tanks, each with a maximum capacity of 514 gallons, used for cleaning, rinsing, and phosphatizing metal inserts. These tanks do not contain any VOC or HAPs.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

This permit is issued for a fixed term of five (5) years from the 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.

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

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

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

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

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

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

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

IDEM:
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

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

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

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

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

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

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

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

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

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

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

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

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

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

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

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

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

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

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

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

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

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to

whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) 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 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

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

(a) Pursuant to 326 IAC 2-8:

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

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

Any monitoring or testing 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.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (∀2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

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

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

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

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) rubber mixer, identified as MIX1, constructed in 1986, with a maximum throughput rate of 1,180 pounds of rubber per hour, with emissions controlled by one (1) baghouse which exhausts through stack MIX1.

(b) One (1) rubber mixer, identified as MIX2, constructed in 2001, with a maximum throughput rate of 2,000 pounds of rubber per hour, with emissions controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B, respectively.

(c) One (1) electric rubber post-cure oven, identified as RC-4, constructed in 1994, with a maximum throughput rate of 240 pounds of rubber per hour, and with emissions exhausting through stack RC4.

(d) One (1) electric rubber post-cure oven, identified as RC-5, constructed in 2000, with a maximum throughput rate of 240 pounds of rubber per hour, and emissions exhausting through stack RC5.

(e) One (1) rubber ingredient weighing and loading operation, with a total maximum throughput rate of 3,180 pounds of rubber per hour, and consisting of the following:

(1) Three (3) automatic carbon black loading systems, exhausting into the building.

(2) Two (2) manual weighing stations, controlled by one (1) baghouse which exhausts through stack MIX1.

(3) One (1) manual weighing station, controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B.

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

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

D.1.1 PM Limit [326 IAC 2-2]

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, PM emissions from each of the mixers MIX1 and MIX2 shall not exceed 1.0 lbs/hr. Combined with PM emissions from other emission units at this source, PM emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.1.2 PM10, VOC, and HAP Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The PM10 emissions from each of the mixers MIX1 and MIX2 shall not exceed 1.0 lbs/hr.

(b) The combined amount of rubber post-cured in RC-4 and RC-5 shall not exceed 200,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. Based on the VOC emission factor of 1.87×10^{-2} lbs/lb rubber from AP-42, Chapter 4-12, this throughput limit is equivalent to 1.87 tons/yr of VOC emissions (200,000 lbs/yr x 1.87×10^{-2} lbs/lb x 1 ton/2000 lbs = 1.87 tons yr). Based on the total HAP emission factor of 3.45×10^{-3} lbs/lb rubber from AP-42, Chapter 4-12, this throughput limit is equivalent to 0.34 tons/yr of total HAP emissions (200,000 lbs/yr x 3.45×10^{-3} lbs/lb x 1 ton/2000 lbs = 0.34 tons/yr).

Combined with PM10 and VOC emissions from other emission units at this source, the PM10 and VOC emissions from the entire source are each limited to less than 100 tons/yr. Combined with the HAP emissions from other emission units at this source, the HAP emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the rubber mixers and the curing ovens shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
MIX1	Rubber Mixer	1,180	2.88
MIX2	Rubber Mixer	2,000	4.10
RC-4	Post-Cure Oven	240	0.99
RC-5	Post-Cure Oven	240	0.99
	Rubber Weighing/Loading Operation	3,180	5.59

The pounds per hour limitations were calculated using the following equation:

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with Conditions D.1.1, D.1.2(a), and D.1.3, the rubber mixers MIX1 and MIX2 shall be controlled by the associated baghouses when these units are in operation.

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

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhausts (stacks MIX1, MIX2A, and MIX2B) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan –

Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the rubber mixers MIX1 and MIX2 at least once per day when these units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.25 to 0.70 kPa (which is equivalent to 1.0 to 2.81 inches of water) or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed annually of all the baghouses controlling the exhausts from the rubber mixers (MIX1 and MIX2). Inspections required by this condition shall not be performed in consecutive months. All bags shall be replaced when performing the inspection.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(b), the Permittee shall maintain monthly records of the total amount of rubber input to the post-cure ovens RC-4 and RC-5.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain daily records of the total static pressure drop during normal operation.

(d) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.

(e) To document compliance with Condition D.1.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2(b) 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 “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6, including one (1) standard parts washer and one (1) bench-top parts washer. [326 IAC 8-3-2]

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically, there are six (6) gritblasters, consisting of the following [326 IAC 2-8-4][326 IAC 2-2][326 IAC 6-3-2]:

(1) One (1) metal casing gritblaster, identified as #52047001, constructed in 2004, with a maximum throughput capacity of 240 pounds of metal parts per hour, with emissions controlled by a dust collector which exhausts inside the building.

(2) One (1) mold cleaning gritblaster, identified as #52966015, constructed in 1981, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(3) One (1) mold cleaning gritblaster, identified as #52016017, constructed in 2001, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(4) One (1) mold cleaning gritblaster, identified as #52966059, constructed in 1991, with a maximum throughput capacity of 15,000 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(5) One (1) mold cleaning gritblaster, identified as #52046018, constructed in 2004, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(6) One (1) mold cleaning gritblaster, identified as #52016022, constructed in 2001, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

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

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

D.3.1 PM Limits [326 IAC 2-2]

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, PM emissions from each of the gritblasters shall not exceed 0.5 lbs/hr. Combined with PM emissions from other emission units at this source, PM emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.3.2 PM10 Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, PM10 emissions from each of the gritblasters shall not exceed 0.5 lbs/hr. Combined with PM10 emissions from other emission units at this source, PM10 emissions from the entire source are limited to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 program) and 326 IAC 2-2 (PSD) are not applicable.

D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the gritblasters shall not exceed the emission limits listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
#52047001	240	0.99
#52966015	2,025	4.13
#52016017	2,025	4.13
#52966059	15,000	15.8
#52046018	900	2.40
#52016022	900	2.40

The pounds per hour limitations were calculated using the following equation:

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

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

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.5 PM and PM10 Control

In order to comply with Conditions D.3.1 through D.3.3, each gritblaster shall be controlled by its associated dust collector at all times when it is in operation.

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

D.3.6 Visible Emissions Notations

(a) Visible emission notations of the dust collector stack exhausts shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collectors at least once per day when the gritblasters are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the normal operating range pertaining to each individual unit or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure

to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.3.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all the dust collectors controlling the exhausts from the gritblasters when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.10 Record Keeping Requirements

(a) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the dust collector stack exhausts when venting to the atmosphere.

(b) To document compliance with Condition D.3.7, the Permittee shall maintain the following operational parameters for the dust collectors equipped with the gritblasters when venting to the atmosphere:

(1) Daily records of the Inlet and outlet differential static pressure during normal operation when venting to the atmosphere.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

(d) To document compliance with Condition D.3.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(v) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(3) One hundred and thirty three (133) rubber molding presses, with a total maximum throughput rate of 2,311 pounds of rubber per hour. [326 IAC 2-8-4]

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

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

D.4.1 FESOP [326 IAC 2-8-4]

(a) The total amount of rubber input to all rubber molding presses shall not exceed 10,000,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total VOC input to the rubber molding presses from the use of mold release agents shall not exceed 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The total HAP input to the rubber molding presses from the use of mold release agents shall not exceed 2.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The mold release agents used at this source shall not contain carbon disulfide.

Combined with VOC emissions from other emission units at this source, the VOC emissions from the entire source are limited to less than 100 tons/yr. Combined with the HAP emissions from other emission units at this source, the HAP emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable.

Compliance Determination Requirements

D.4.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP emission limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.4.3 Record Keeping Requirements

(a) To document compliance with Condition D.4.1(a), the Permittee shall maintain monthly records of the amount of total rubber input to the rubber molding presses.

(b) To document compliance with Conditions D.4.1(b), (c), and (d), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.4.1(b), (c), and (d).

(1) The VOC and HAP content of each mold release used less water.

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

(3) The VOC and HAP inputs for each month.

(4) The total VOC and HAP inputs for each compliance period.

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

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1(a), (b), and (c) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.5 FACILITY OPERATION CONDITIONS

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

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

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

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

D.5.1 Particulate [326 IAC 6-3-2]

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the trimmers 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: PM, PM10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010
Facility: Rubber Post-Cure Ovens RC-4 and RC-5
Parameter: Total rubber cured
Limit: Less than 200,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010
Facility: 133 Rubber Molding Presses
Parameter: Total rubber pressed
Limit: Less than 10,000,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010
Facility: Rubber Presses
Parameter: Total VOC input from the use of mold release agents
Limit: Less than 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010
Facility: Rubber Presses
Parameter: Total HAP input from the use of mold release agents
Limit: Less than 2.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Freudenberg – NOK General Partnership
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170
Mailing Address: 821 South Lake Road, Scottsburg, Indiana 47170
FESOP No.: F143-21240-00010

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Freudenberg - NOK General Partnership
Source Location:	821 South Lake Road, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	3053, 3089
Operation Permit No.:	F143-21240-00010
Permit Reviewer:	ERG/YC

On September 3, 2005 the Office of Air Quality (OAQ) had a notice published in the Scott County Journal, Scottsburg, Indiana, stating that Freudenberg - NOK General Partnership had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a rubber parts manufacturing plant with control. 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.

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

1. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained 40 CFR 52, Subpart P requirements.

   Condition D.5.2, which also contained these requirements for the insignificant adhesive application booths, has been removed. Since the maximum coating usage at each of the adhesive application booths is less than 5 gallons per day, particulate emissions from the adhesive application booths are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(15). There will be no specific requirements applicable to the insignificant adhesive application booths. Therefore, these units have been removed from Section D.5.

   Conditions A.3, C.1, and D.5 have been revised as follows to reflect the above rule changes:

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

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

…

(v) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

…

(4) Three (3) adhesive application booths, each with a maximum capacity of 10,300 metal parts per hour. ~~[40 CFR 52, Subpart P]~~

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

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

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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

~~(v) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:~~

~~(4) Three (3) adhesive application booths, each with a maximum capacity of 10,300 metal parts per hour. [40 CFR 52, Subpart P]~~

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

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

…

~~D.5.2 Particulate Matter [40 CFR 52, Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the particulate matter from each of the adhesive spray application 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~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Freudenberg- NOK General Partnership
Source Location:	821 South Lake Road, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	3053, 3089
Operation Permit No.:	F143-21240-00010
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application for a transition from a Title V to a FESOP for Freudenberg- NOK General Partnership relating to the operation of a rubber parts manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) rubber mixer, identified as MIX1, constructed in 1986, with a maximum throughput rate of 1,180 pounds of rubber per hour, with emissions controlled by one (1) baghouse which exhausts through stack MIX1.

(b) One (1) rubber mixer, identified as MIX2, constructed in 2001, with a maximum throughput rate of 2,000 pounds of rubber per hour, with emissions controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B, respectively.

(c) One (1) electric rubber post-cure oven, identified as RC-4, constructed in 1994, with a maximum throughput rate of 240 pounds of rubber per hour, and with emissions exhausting through stack RC4.

(e) One (1) rubber ingredient weighing and loading operation, with a total maximum throughput rate of 3,180 pounds of rubber per hour, and consisting of the following:

(1) Three (3) automatic carbon black loading systems, exhausting into the building.

(2) Two (2) manual weighing stations, controlled by one (1) baghouse which exhausts through stack MIX1.

(3) One (1) manual weighing station, controlled by two (2) baghouses which exhaust through stacks MIX2A and MIX2B.

Unpermitted Emission Units and Pollution Control Equipment

(d) One (1) electric rubber post-cure oven, identified as RC-5, constructed in 2000, with a maximum throughput rate of 240 pounds of rubber per hour, and emissions exhausting through stack RC5.

New Emission Units and Pollution Control Equipment

There are no new emission units or pollution control equipment at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including twenty-seven (27) units, and with total maximum heat input capacity of 23.0 MMBtu/hr.

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids, including two (2) hydraulic oil tanks.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6, including one (1) standard parts washer and one (1) bench-top parts washer. [326 IAC 8-3-2]

(f) Closed loop heating and cooling systems.

(g) Groundwater oil recovery wells.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Heat exchanger cleaning and repair.

(l) Process vessel degassing and cleaning to prepare for internal repairs.

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically, there

are six (6) gritblasters, consisting of the following [326 IAC 2-8-4][326 IAC 2-2][326 IAC 6-3-2]:

(1) One (1) metal casing gritblaster, identified as #52047001, constructed in 2004, with a maximum throughput capacity of 240 pounds of metal parts per hour, with emissions controlled by a dust collector which exhausts inside the building.

(2) One (1) mold cleaning gritblaster, identified as #52966015, constructed in 1981, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(3) One (1) mold cleaning gritblaster, identified as #52016017, constructed in 2001, with a maximum throughput capacity of 2,025 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(4) One (1) mold cleaning gritblaster, identified as #52966059, constructed in 1991, with a maximum throughput capacity of 15,000 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(5) One (1) mold cleaning gritblaster, identified as #52046018, constructed in 2004, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(6) One (1) mold cleaning gritblaster, identified as #52016022, constructed in 2001, with a maximum throughput capacity of 900 pounds per hour, with emissions controlled by a dust collector which exhausts inside the building.

(s) Filter or coalescer media changeout.

(t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(u) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(v) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) Three (3) rubber warm-up mills, each with a maximum throughput rate of 206 pounds of rubber per hour.

(2) Five (5) rubber extruders, with a total maximum throughput rate of 2,748 pounds of rubber per hour.

(3) One hundred and thirty three (133) rubber molding presses, with a total maximum throughput rate of 2,311 pounds of rubber per hour. [326 IAC 2-8]

(4) Three (3) adhesive application booths, each with a maximum capacity of 10,300 metal parts per hour. [40 CFR 52, Subpart P]

(5) One (1) rubber sheet cooling carousel, with a maximum throughput rate of 2,000 pounds of rubber per hour.

(6) Eight (8) plastic presses.

(7) Three (3) electric plastic cure ovens.

(8) One (1) molycote tumbler for small rubber parts.

(9) Six (6) phosphating tanks, each with a maximum capacity of 514 gallons, used for cleaning, rinsing, and phosphatizing metal inserts. These tanks do not contain any VOC or HAPs.

Existing Approvals

The following previous air approvals have been issued to this source:

(a) TV #143-8936-00010, issued on February 21, 2001.

(b) First Minor Permit Modification #143-14699-00010, issued on September 5, 2001.

(c) First Administrative Amendment #143-15391-00010, issued on January 8, 2002.

(d) Second Administrative Amendment #143-18747-00010, issued on April 6, 2004.

(e) Third Administrative Amendment #143-19423-00010, issued on August 24, 2004.

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

(a) Mixer MIX3 and post-cure ovens RC-2 and RC-3 have been removed from this source. Therefore, the associated requirements for these units have been removed from the FESOP.

(b) The Permittee stated that post-cure oven RC-4 has existed at the plant since the submittal of the original Part 70 permit application. However, this unit was not included in the source's Part 70 permit (#143-8936-00010, issued on February 21, 2001). The source stated that the omission of this unit might have resulted from a miscommunication regarding which post-cure ovens had been removed. Therefore, the requirements for post-cure oven RC-4 have been added to this FESOP.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on May 26, 2005. Additional information was received on June 16, 2005 and August 10, 2005.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 17).

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 or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	331
PM10	293
SO_2	0.06
VOC	183
CO	8.46
NO_x	10.1

HAPs	Potential to Emit (tons/yr)
Hxeane	8.30
Carbon Disulfide	13.4
Glycol Ether	1.77
Phenol	0.95
Other HAPs	2.48
Total	26.9

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions of PM10 and VOC below the Title V levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions of HAPs below the Title V levels.

(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 applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/Emission Unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Rubber Mixers	Less than 8.76	Less than 8.76	-	6.19	-	-	1.96 (total) 1.57 (single)*
Curing Ovens	1.42	1.42	-	Less than 1.87	-	-	Less than 0.34 (total) 0.28 (single)*
Rubber Weighing/Loading Operation	6.96	6.96	-	-	-	-	-
Rubber Presses	-	-	-	Less than 33.4	-	-	Less than 6.80 (total) 6.61 (single)**
Use of Release Agents for Rubber Presses	-	-	-	Less than 15.0	-	-	Less than 2.00 (total); No Carbon Disulfide
Gritblasters	Less than 13.1	Less than 13.1	-	-	-	-	-
Adhesive Application Booths (Insignificant)	0.95	0.95	-	1.06	-	-	0.97 (total)
Rubber Milling (Insignificant)	-	-	-	1.76	-	-	0.20 (total)
Extruding Process (Insignificant)	-	-	-	1.28	-	-	0.91 (total)
Parts Washers (Insignificant)	-	-	-	0.12	-	-	-
Natural Gas Fired Units (Insignificant)	0.77	0.77	0.06	0.55	8.46	10.1	Negligible
Plastic Pressing Operation (Insignificant)	-	-	-	1.70	-	-	-
Plastic Curing Process (Insignificant)	-	-	-	0.05	-	-	-
Rubber Cooling Carousel (Insignigicant)	-	-	-	0.38	-	-	-
Other Insignificant Activities	Less than 5.0	Less than 5.0	-	Less than 1.0	-	-	Negligible
Total PTE of the Entire Source	Less than 37.0	Less than 37.0	0.06	Less than 64.4	8.46	10.1	Less than 13.2 for total HAPs and less than 8.38 for a single HAP ***
Title V Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

Note: "-" pollutant not emitted by the process/emission unit.
(*) The maximum single HAP emitted from these processes is Hexane.
(**) The maximum single HAP emitted from the rubber presses is Carbon Disulfide.
(***) The maximum single HAP emissions are the Carbon Disulfide emissions which include 6.61 tons/yr from the rubber presses and 1.77 tons/yr from rubber mixing, milling, extruding, and curing processes.

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment or Unclassifiable
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (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. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Scott County has been classified as unclassifiable or attainment for PM 2.5. 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 PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions.

(c) Scott 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.

Source Status

Existing Source PSD 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	Less than 37.0
PM10	Less than 37.0
SO_2	0.06
VOC	Less than 64.4
CO	8.46
NO_x	10.1
Combination HAPs	Less than 13.2

(a) This existing source is not a PSD major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

(b) These emissions are based on the potential to emit of this source after issuance of this FESOP (see the emission calculations in Appendix A).

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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20, and 40 CFR Part 61 and 63) included in this permit.

(c) The solvents used in the parts washers do not contain any halogenated HAP as defined in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air

Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T) are not applicable to this source.

State Rule Applicability – Entire Source

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

This existing source was constructed in 1981 and was a PSD minor source when it was constructed. This plant was modified in 1991, 1994, 2001, and 2004. This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1). The potential to emit of PM and PM10 before control from the entire source became greater than 250 tons/yr after the modification in 2001. However, the actual PM/PM10 emissions from this source have been kept well below the PSD major source thresholds by the use of particulate matter control devices (e.g.: baghouses and dust collectors). In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) PM emissions from each of the mixers MIX1 and MIX2 shall not exceed 1.0 lbs/hr. This is equivalent to a total of 8.76 tons/yr of PM emissions from these units. The use of baghouses ensures compliance with this limit.

(b) PM emissions from each of the six (6) gritblasters shall not exceed 0.5 lbs/hr. This is equivalent to a total of 13.1 tons/yr of PM emissions from these units. The use of dust collectors ensures compliance with this limit.

Combined with PM emissions from other emission units at this source, PM emissions from the entire source are limited to less than 250 tons/yr. The Permittee has agreed to comply with the FESOP limitations (see the discussion for 326 IAC 2-8-4 below) to limit the PM10 emission from the entire source to less than 100 tons/year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

This existing source was constructed in 1981 and modified in 1991, 1994, 2001, and 2004.The potential to emit HAP from the modifications in 2001 and 2004 is each less than 10 tons/yr for a single HAP and less than 25 tons/yr for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to the modifications in 2001 and 2004. In addition, the Permittee has accepted FESOP requirements to limit the HAPs emissions from the entire source to less than the HAP major source thresholds.

326 IAC 2-8-4 (FESOP)

The potential to emit PM10 and VOC from this existing source before control is greater than 100 tons/yr. In addition, the potential to emit HAPs of this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. In order to make the requirements of 326 IAC 2-7 (Part 70 Program) not applicable, the Permittee has elected to comply with the following FESOP limits:

(a) The PM10 emissions from each of the mixers MIX1 and MIX2 shall not exceed 1.0 lbs/hr. This is equivalent to a total of 8.76 tons/yr of PM10 emissions from these units. The use of baghouses ensures compliance with this limit.

(b) The combined amount of rubber post-cured in RC-4 and RC-5 shall not exceed 200,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. Based on the VOC emission factor of 1.87×10^{-2} lbs/lb rubber and the total HAP emission factor of 3.45×10^{-3} lbs/lb rubber from AP-42, Chapter 4-12, this is equivalent to 1.87 tons/yr of VOC emissions and 0.34 tons/yr of total HAP emissions (see the emission calculations in Appendix A).

(c) The total amount of rubber input to all rubber molding presses shall not exceed 10,000,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. Based on the VOC emission factor of 6.68×10^{-3} lbs/lb rubber and the total HAP emission factor of 1.36×10^{-3} lbs/lb rubber from AP-42, Chapter 4-12, this is equivalent to 33.3 tons/yr of VOC emissions, 6.61 tons/yr of carbon

disulfide (the maximum single HAP) emissions, and 6.8 tons/yr of total HAP emissions (see the emission calculations in Appendix A).

(d) The total VOC input to the rubber molding presses from the use of mold release agents shall not exceed 15 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(e) The total HAP input to all rubber molding presses from the use of mold release agents shall not exceed 2.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(f) The mold release agent used at this source shall not contain carbon disulfide.

(g) PM10 emissions from each of the six (6) gritblasters shall not exceed 0.5 lbs/hr. This is equivalent to a total of 13.1 tons/yr of PM10 emissions from these units. The use of dust collectors ensures compliance with this limit.

Combined with the PM10, VOC, and HAP emissions from other emission units, the PM10 and VOC emissions from the entire source are each limited to less than 100 tons/yr and the HAP emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr for combined HAP. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Scott County and is not required to operate under a Part 70 permit. Therefore, the requirements of 326 IAC 2-6 are not applicable to this source.

326 IAC 5-1 (Opacity Limitations)

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

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

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

State Rule Applicability – Rubber Mixing and Curing Processes

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

The allowable particulate emissions from the rubber mixers and the curing ovens shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (pounds/hr)	Particulate Emission Limit (lbs/hr)
MIX1	Rubber Mixer	1,180	2.88
MIX2	Rubber Mixer	2,000	4.10
RC-4	Post-Cure Oven	240	0.99
RC-5	Post-Cure Oven	240	0.99

The pounds per hour limitations were calculated using the following equation:

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

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

As shown in the emission calculations in Appendix A, the potential to emit particulate from each of these processes is less than the emission limits above. Therefore, these units are in compliance with particulate emission limits in 326 IAC 6-3-2. The use of baghouses for the rubber mixers ensures compliance with the limits above. The potential to emit particulate for the post cure ovens is less than the 0.99 lbs/hr emission limit calculated above. Therefore, no controls are required for these units to comply with 326 IAC 6-3.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Each of the rubber mixers (MIX1 and MIX2) and the curing ovens (RC-4 and RC-5) was constructed after 1980 and has potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these units.

State Rule Applicability – Rubber Weighing/Loading Process

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

The allowable particulate emissions from the rubber weighing/loading process shall not exceed 5.59 lbs/hr when operating at the maximum throughput rate of 3,180 pounds of rubber per hour.

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

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

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

As shown in the emission calculations in Appendix A, the potential to emit particulate from this unit is less than the emission limit above. Therefore, this unit is in compliance with particulate emission limits in 326 IAC 6-3-2.

State Rule Applicability – Parts Washers (Insignificant)

326 IAC 8-3-2 (Cold Cleaning Operations)

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The parts washers at this source were constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

The parts washers at this source have remote solvent reservoirs. Therefore, the parts washers at this source are not subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

State Rule Applicability – Gritblasters (Insignificant)

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

The allowable particulate emissions from each of the six (6) gritblasters shall not exceed the emission limits listed in the table below:

Unit ID	Max. Throughput Rate (lbs/hr)	Particulate Emission Limit (lbs/hr)
#52047001	240	0.99
#52966015	2,025	4.13
#52016017	2,025	4.13
#52966059	15,000	15.8
#52046018	900	2.40
#52016022	900	2.40

The pounds per hour limitations were calculated using the following equation:

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

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

As shown in the emission calculations in Appendix A, the potential to emit particulate from these units is less than the emission limits above. The use of dust collectors for grit blasters #52047001, #52046018, and #52016022, ensures compliance with the limits above.

State Rule Applicability – Trimmers (Insignificant)

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

The allowable particulate emissions from each of the trimmers shall be limited by the following:

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

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

State Rule Applicability – Adhesive Application Booths (Insignificant)

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

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

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from each of the adhesive application booths shall be limited by the following:

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

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

Under the rule revision, particulate from these adhesive application booths are exempt from the requirements of 326 IAC 6-3-2 because the maximum coating usage at each of the adhesive application booths is less than 5 gallons per day.

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

The actual VOC emissions from each of the adhesive applications are less than 15 pounds per day. Therefore, these units are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), pursuant to 326 IAC 8-2-1(a)(4).

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Each of the adhesive applications has potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these units.

State Rule Applicability – Plastic Pressing, Post Curing, and Rubber Cooling Carousel (Insignificant)

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Each of the plastic pressing units, plastic post-curing ovens, and the rubber cooling carousel have potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable to these units.

State Rule Applicability – Natural Gas Fired Units (Insignificant)

There are no specifically applicable requirements for these units.

Testing Requirements

The Permittee is required to maintain monthly records of the weight of the rubber processed to demonstrate compliance with the FESOP limits. In addition, the Permittee is required to perform daily visible emission notations, daily pressure drop monitoring, and quarterly inspections for baghouses equipped with the rubber mixers MIX1 and MIX2. Therefore, no stack tests are required.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

1. The rubber mixers, which are equipped with baghouses for particulate control, have applicable compliance monitoring conditions as specified below.

   (a) Visible emission notations of the baghouse stack exhausts (stacks MIX1, MIX2A, and MIX2B) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For

processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

(b) The Permittee shall record the total static pressure drop across the baghouses at least once per day when the rubber mixers are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.25 to 0.70 kPa (which is equivalent to 1.0 to 2.81 inches of water) or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) An inspection shall be performed annually of all the baghouses controlling the exhausts from the rubber mixers. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced when performing the operation.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because the rubber mixers MIX1 and MIX2 and their control devices must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

2. The six (6) insignificant gritblasters, which are currently controlled by dust collectors and vent into the building, have applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of the dust collector stack exhausts shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

   (b) The Permittee shall record the total static pressure drop across the dust collectors at least once per day when the gritblasters are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the normal operating range retaining to each individual unit or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

   (c) An inspection shall be performed each calendar quarter of all the dust collectors controlling the exhausts from the gritblasters when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

   (d) In the event that bag failure has been observed:

      (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

      (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because the gritblasters and the associated dust collectors must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this rubber parts manufacturing plant shall be subject to the conditions of FESOP 143-21240-00010.

Appendix A: Emission Calculations
PM and PM10 Emissions
From Two (2) Mixers (MIX1 and MIX2)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Unit ID	Max. Throughput Rate (lbs/hr)	Emission Factor* (lbs/lbs of rubber)	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)	Control Device	Control Efficiency*	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
MIX1	1,180	1.36E-02	16.0	70.3	Baghouse	99.3%	0.11	0.49
MIX2	2,000	1.36E-02	27.2	119	Baghouse	99.3%	0.19	0.83
Total				**189**				**1.33**

*The emission factor is from draft AP-42, Chapter 4.12 (AP-42, 06/99) and is the worst case scenario among all types of rubbers.

Methodology

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM/PM10 after Control (lbs/hr) = PTE of PM/PM10 before Control (lbs/hr) x (1 - Control Efficiency)
PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (lbs/hr) x (1 - Control Efficiency) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From Rubber Mixing Process (Mixers MIX1 and MIX2)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Max. Throughput Rate (lbs/hr): 3,180 (for 2 units combined)

	CAS No.	Emisson Factor* (lb/lb rubber)	PTE (tons/yr)
Total VOC		4.44E-04	**6.19**
Total HAPs		1.40E-04	**1.96**
1,1,1-Trichloroethane	71-55-6	7.31E-07	1.02E-02
1,1-Dichloroethene	75-35-4	5.47E-07	7.62E-03
1,3-Butadiene	106-99-0	4.67E-07	6.51E-03
1,4-Dichlorobenzene	106-37-6	4.48E-09	6.24E-05
2,4-Dinitrophenol	51-28-5	1.62E-08	2.25E-04
2-Butanone	78-93-3	5.91E-06	8.23E-02
2-Chloroacetophenone	532-27-4	5.46E-10	7.60E-06
2-Methylphenol	95-48-7	8.64E-08	1.20E-03
4-Methyl-2-Pentanone	108-10-1	3.06E-05	4.27E-01
4-Nitrophenol	100-02-7	9.90E-09	1.38E-04
Acetaldehyde	75-07-0	6.95E-07	9.69E-03
Acetaldehyde + Isobutane		6.12E-07	8.52E-03
Acetonitrile	75-05-8	4.63E-07	6.45E-03
Acetophenone	98-86-2	2.32E-06	3.23E-02
Acrolein	107-02-8	8.26E-07	1.15E-02
Acrylonitrile	107-13-1	1.17E-05	1.63E-01
Aniline	62-53-3	5.13E-07	7.15E-03
Benzene	71-43-2	6.61E-07	9.20E-03
Benzidine	92-87-5	1.80E-08	2.51E-04
Biphenyl	92-52-4	5.63E-08	7.85E-04
bis(2-Ethylhexyl)phthalate	117-81-7	7.40E-07	1.03E-02
Bromoform	75-25-2	2.78E-07	3.87E-03
Bromomethane	74-83-9	5.62E-08	7.83E-04
Cadmium (Cd) Compounds		9.35E-09	1.30E-04
Carbon Disulfide	75-15-0	1.03E-04	1.43E+00
Carbon Tetrachloride	56-23-5	4.68E-05	6.52E-01
Carbonyl Sulfide	463-58-1	2.24E-05	3.13E-01
Chloroethane	75-00-3	1.70E-06	2.37E-02
Chloroform	67-66-3	6.51E-07	9.06E-03
Chloromethane	74-87-3	8.86E-07	1.23E-02
Chromium (Cr) Compounds		1.23E-07	1.71E-03
Cumene	98-82-8	3.17E-06	4.42E-02
Di-n-butylphthalate	84-74-2	3.34E-07	4.65E-03
Dibenzofuran	132-64-9	3.42E-08	4.76E-04
Dimethylaminoazobenzene	60-11-7	1.64E-08	2.28E-04
Dimethylphthalate	131-11-3	1.57E-08	2.19E-04
Ethyl Acrylate	140-88-5	4.73E-06	6.58E-02
Ethylbenzene	100-41-4	4.32E-06	6.02E-02
Hexachlorobenzene	118-74-1	9.29E-09	1.29E-04
Hexachloroethane	67-72-1	1.23E-06	1.72E-02
Hexane	**110-54-3**	**1.13E-04**	**1.57E+00**
Hydroquinone	123-31-9	2.62E-05	3.66E-01
Isooctane	540-84-1	7.95E-07	1.11E-02
Isophorone	78-59-1	6.63E-07	9.24E-03
Lead (Pb) Compounds		2.03E-08	2.82E-04
m-Xylene + p-Xylene		1.44E-05	2.01E-01
Methylene Chloride	75-09-2	3.86E-05	5.38E-01
N-Nitrosodimethylamine	86-30-6	2.34E-09	3.26E-05
Naphthalene	91-20-3	3.08E-07	4.29E-03
Nickel (Ni) Compounds		9.53E-08	1.33E-03
Nitrobenzene	98-95-3	2.02E-08	2.81E-04
o-Toluidine	95-53-4	2.23E-07	3.11E-03
o-Xylene	95-47-6	7.73E-06	1.08E-01
Pentachlorophenol	87-86-5	1.25E-08	1.74E-04
Phenol	108-95-2	1.27E-06	1.77E-02
Propanal	123-38-6	3.33E-06	4.63E-02
Propylene Oxide	75-56-9	6.97E-06	9.70E-02
Styrene	100-42-5	4.25E-06	5.92E-02
t-Butyl Methyl Ether	1634-04-4	7.98E-06	1.11E-01
Tetrachloroethene	127-18-4	4.10E-06	5.71E-02
Toluene	108-88-3	2.31E-05	3.21E-01
Trichloroethene	79-01-6	2.22E-07	3.09E-03
Vinyl Acetate	108-05-4	2.35E-06	3.27E-02
Vinyl Chloride	75-01-4	1.32E-08	1.83E-04

*Emission factors are from draft AP-42, Chapter 4.12 (AP-42, 06/99) and are the worst case scenario among all types of rubbers.

Methodology
PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions
From Two (2) Curing Ovens (RC-4 and RC-5)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Unit ID	Max. Throughput Rate (lbs/hr)	PM/PM10 Emission Factor* (lbs/lbs of rubber)	PTE of PM/PM10 (lbs/hr)	PTE of PM/PM10 (tons/yr)
RC-4	240	6.75E-04	0.16	0.71
RC-5	240	6.75E-04	0.16	0.71
Total				**1.42**

* Emission factor is provided by the source based on the test data from a similar plant.

Note: The VOC and HAP emissions from the curing ovens are calculated on page 4 of Appendix A.

Methodology

PTE of PM/PM10 (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs)
PTE of PM/PM10 (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From Oven Curing Process (Ovens RC-4 and RC-5)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Max. Throughput Rate:	480	lbs/hr (2 units combined)
Annual Throughput Limit:	200,000	lbs/yr

	CAS No.	Emisson Factor* (lb/lb rubber)	Unlimited PTE (tons/yr)	Limited PTE (tons/yr)
Total VOC		1.87E-02	**39.3**	**1.87**
Total HAPs		3.45E-03	**7.25**	**0.34**
1,1,1-Trichloroethane	71-55-6	1.47E-05	3.08E-02	1.47E-03
1,1-Dichloroethene	75-35-4	5.40E-06	1.14E-02	5.40E-04
1,3-Butadiene	106-99-0	9.41E-06	1.98E-02	9.41E-04
2,4-Dinitrophenol	51-28-5	3.98E-07	8.38E-04	3.98E-05
2-Butanone	78-93-3	1.44E-04	3.02E-01	1.44E-02
2-Chloroacetophenone	532-27-4	1.34E-08	2.83E-05	1.34E-06
2-Methylphenol	95-48-7	2.10E-06	4.41E-03	2.10E-04
4-Methyl-2-Pentanone	108-10-1	1.93E-04	4.05E-01	1.93E-02
4-Nitrophenol	100-02-7	2.44E-07	5.12E-04	2.44E-05
Acetaldehyde	75-07-0	1.71E-05	3.60E-02	1.71E-03
Acetonitrile	75-05-8	1.14E-05	2.40E-02	1.14E-03
Acetophenone	98-86-2	2.13E-04	4.47E-01	2.13E-02
Acrolein	107-02-8	2.03E-05	4.27E-02	2.03E-03
Acrylonitrile	107-13-1	2.59E-04	5.44E-01	2.59E-02
Aniline	62-53-3	1.26E-05	2.66E-02	1.26E-03
Benzene	71-43-2	4.88E-05	1.03E-01	4.88E-03
Benzidine	92-87-5	9.15E-08	1.92E-04	9.15E-06
Biphenyl	92-52-4	3.96E-06	8.33E-03	3.96E-04
bis(2-Ethylhexyl)phthalate	117-81-7	1.01E-05	2.12E-02	1.01E-03
Bromoform	75-25-2	6.85E-06	1.44E-02	6.85E-04
Bromomethane	74-83-9	1.39E-06	2.91E-03	1.39E-04
Carbon Disulfide	75-15-0	1.37E-03	2.88E+00	1.37E-01
Carbon Tetrachloride	56-23-5	2.38E-04	5.00E-01	2.38E-02
Carbonyl Sulfide	463-58-1	1.91E-04	4.01E-01	1.91E-02
Chloroethane	75-00-3	4.04E-05	8.50E-02	4.04E-03
Chloroform	67-66-3	3.31E-06	6.95E-03	3.31E-04
Chloromethane	74-87-3	2.08E-05	4.37E-02	2.08E-03
Cumene	98-82-8	7.54E-05	1.59E-01	7.54E-03
Di-n-butylphthalate	84-74-2	8.22E-06	1.73E-02	8.22E-04
Dibenzofuran	132-64-9	3.29E-06	6.91E-03	3.29E-04
Dimethylaminoazobenzene	60-11-7	8.32E-08	1.75E-04	8.32E-06
Dimethylphthalate	131-11-3	3.87E-07	8.14E-04	3.87E-05
Ethyl Acrylate	140-88-5	1.16E-04	2.45E-01	1.16E-02
Ethylbenzene	100-41-4	1.06E-04	2.24E-01	1.06E-02
Hexachlorobenzene	118-74-1	2.29E-07	4.81E-04	2.29E-05
Hexachloroethane	67-72-1	6.26E-06	1.32E-02	6.26E-04
Hexane	**110-54-3**	**2.78E-03**	**5.84E+00**	**2.78E-01**
Hydroquinone	123-31-9	4.11E-06	8.65E-03	4.11E-04
Isooctane	540-84-1	1.89E-05	3.98E-02	1.89E-03
Isophorone	78-59-1	1.63E-05	3.43E-02	1.63E-03
m-Xylene	108-38-3	1.33E-06	2.80E-03	1.33E-04
m-Xylene + p-Xylene		3.52E-04	7.40E-01	3.52E-02
Methylene Chloride	75-09-2	9.50E-04	2.00E+00	9.50E-02
N,N-Dimethylaniline	121-69-7	1.26E-06	2.65E-03	1.26E-04
Naphthalene	91-20-3	7.01E-06	1.47E-02	7.01E-04
Nitrobenzene	98-95-3	4.97E-07	1.04E-03	4.97E-05
o-Toluidine	95-53-4	2.03E-06	4.26E-03	2.03E-04
o-Xylene	95-47-6	1.89E-04	3.97E-01	1.89E-02
p-Xylene	106-42-3	2.53E-05	5.33E-02	2.53E-03
Pentachlorophenol	87-86-5	3.08E-07	6.48E-04	3.08E-05
Phenol	108-95-2	3.13E-05	6.57E-02	3.13E-03
Propanal	123-38-6	8.19E-05	1.72E-01	8.19E-03
Propylene Oxide	75-56-9	1.72E-04	3.61E-01	1.72E-02
Styrene	100-42-5	2.16E-05	4.54E-02	2.16E-03
Substituted Quinoline	91-22-5	1.23E-04	2.59E-01	1.23E-02
t-Butyl Methyl Ether	1634-04-4	4.06E-05	8.53E-02	4.06E-03
Tetrachloroethene	127-18-4	1.01E-04	2.12E-01	1.01E-02
Toluene	108-88-3	5.62E-04	1.18E+00	5.62E-02
Trichloroethene	79-01-6	5.46E-06	1.15E-02	5.46E-04
Vinyl Chloride	75-01-4	6.69E-08	1.41E-04	6.69E-06

*Emission factors are provided by the source based on the rubber curing emission factors in draft AP-42, Chapter 4.12 (AP-42, 06/99) and have been adjusted to avoid double counting the emissions from the press curing process.

Methodology

Unlimited PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Limited PTE (tons/yr) = Annual Throughput Limit (lbs/yr) x Emission Factor (lbs/lbs) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From Platen Press Curing Process

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Max. Throughput Rate:	2,311	lbs/hr (133 units combined)
Annual Throughput Limit:	10,000,000	lbs/yr

	CAS No.	Emisson Factor* (lb/lb rubber)	Unlimited PTE (tons/yr)	Limited PTE (tons/yr)
Total VOC		6.68E-03	**67.6**	**33.4**
Total HAPs		1.36E-03	**13.8**	**6.80**
1,1,1-Trichloroethane	71-55-6	3.56E-04	3.61E+00	1.78E+00
1,1-Dichloroethene	75-35-4	1.07E-05	1.08E-01	5.35E-02
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	1.68E-04	8.28E-05
1,3-Butadiene	106-99-0	2.56E-05	2.60E-01	1.28E-01
1,4-Dichlorobenzene	106-46-7	1.03E-07	1.05E-03	5.16E-04
2-Butanone	78-93-3	5.35E-05	5.41E-01	2.67E-01
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	9.19E-02	4.54E-02
2-Methylphenol	95-48-7	1.17E-07	1.19E-03	5.87E-04
4-Methyl-2-Pentanone	108-10-1	5.99E-04	6.06E+00	2.99E+00
Acetaldehyde	75-07-0	1.00E-05	1.01E-01	5.00E-02
Acetonitrile	75-05-8	5.47E-06	5.53E-02	2.73E-02
Acetophenone	98-86-2	4.39E-04	4.45E+00	2.20E+00
Acrolein	107-02-8	4.44E-06	4.50E-02	2.22E-02
Acrylonitrile	107-13-1	3.02E-05	3.06E-01	1.51E-01
Aniline	62-53-3	1.02E-03	1.03E+01	5.08E+00
Benzene	71-43-2	5.62E-06	5.69E-02	2.81E-02
Benzidine	92-87-5	4.53E-06	4.59E-02	2.27E-02
Biphenyl	92-52-4	3.06E-07	3.10E-03	1.53E-03
bis(2-Ethylhexyl)phthalate	117-81-7	1.78E-05	1.80E-01	8.91E-02
Carbon Disulfide	**75-15-0**	**1.32E-03**	**1.34E+01**	**6.61E+00**
Carbon Tetrachloride	56-23-5	9.15E-04	9.26E+00	4.57E+00
Carbonyl Sulfide	463-58-1	4.39E-04	4.44E+00	2.19E+00
Chloroethane	75-00-3	1.48E-06	1.50E-02	7.39E-03
Chloroform	67-66-3	1.27E-05	1.29E-01	6.36E-02
Chloromethane	74-87-3	7.68E-06	7.78E-02	3.84E-02
Cumene	98-82-8	2.76E-06	2.79E-02	1.38E-02
Di-n-butylphthalate	84-74-2	9.64E-06	9.76E-02	4.82E-02
Dibenzofuran	132-64-9	1.54E-07	1.55E-03	7.68E-04
Dimethylaminoazobenzene	60-11-7	3.20E-07	3.24E-03	1.60E-03
Dimethylphthalate	131-11-3	1.80E-07	1.82E-03	9.01E-04
Ethylbenzene	100-41-4	5.43E-06	5.49E-02	2.71E-02
Hexachlorobutadiene	87-68-3	3.93E-07	3.98E-03	1.96E-03
Hexachloroethane	67-72-1	2.41E-05	2.44E-01	1.20E-01
Hexane	110-54-3	3.00E-04	3.03E+00	1.50E+00
Hydroquinone	123-31-9	1.58E-05	1.60E-01	7.91E-02
Isooctane	540-84-1	4.81E-06	4.87E-02	2.40E-02
Isophorone	78-59-1	1.16E-06	1.17E-02	5.80E-03
m-Xylene + p-Xylene		1.73E-05	1.75E-01	8.63E-02
Methylene Chloride	75-09-2	4.87E-05	4.92E-01	2.43E-01
Naphthalene	91-20-3	4.04E-06	4.09E-02	2.02E-02
o-Toluidine	95-53-4	4.36E-06	4.42E-02	2.18E-02
o-Xylene	95-47-6	1.86E-05	1.88E-01	9.30E-02
Phenol	108-95-2	2.67E-06	2.70E-02	1.33E-02
Propylene Oxide	75-56-9	1.04E-04	1.05E+00	5.19E-01
Styrene	100-42-5	8.31E-05	8.41E-01	4.15E-01
t-Butyl Methyl Ether	1634-04-4	1.56E-04	1.58E+00	7.80E-01
Tetrachloroethene	127-18-4	1.36E-05	1.37E-01	6.79E-02
Toluene	108-88-3	3.96E-05	4.01E-01	1.98E-01
Vinyl Chloride	75-01-4	2.57E-07	2.60E-03	1.29E-03

*Emission factors are from draft AP-42, Chapter 4.12 (AP-42, 06/99) and are the worst case scenario among all types of rubbers.

Methodology
Unlimited PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs
Limited PTE (tons/yr) = Annual Throughput Limit (lbs/yr) x Emission Factor (lbs/lbs) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From the Usage of Release in Rubber Presses

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

1. Potential to Emit VOC:

Type of Press	Mold Release Used*	Max. Usage (lbs/hr/press)	Number of Presses	Weight % VOC	PTE of VOC (lbs/day/press)	PTE of VOC (tons/yr)
24" Compression Press	RR5	0.2220	43	91.5%	4.88	38.3
440 Desma Press	Monocoat 327W	0.2830	9	5.70%	0.39	0.64
Desma 160 ton Single Cavity	n/a	n/a	54	n/a	0.00	0.00
Pin Boot Presses	RR5	0.2220	2	91.5%	4.88	1.78
Engel Air Seal Injection Presses	RR5	0.2220	3	91.5%	4.88	2.67
Lathe Cute Injection Press	RR5	0.2220	4	91.5%	4.88	3.56
24" Transfer Press	RR5	0.2220	12	91.5%	4.88	10.7
14" Compression Press	RR5	0.0188	2	91.5%	0.41	0.15
Desma 966	RR5	0.2220	2	91.5%	4.88	1.78
Lawton Presses	RR5	0.2220	2	91.5%	4.88	1.78
Total			**133**			**61.3**

* This is the worst case material for VOC emissions.

METHODOLOGY

PTE of VOC (lbs/day) = Max. Usage (lbs/hr/press) x Weight % VOC x 24 hr/day
PTE of VOC (tons/yr) = Max. Usage (lbs/hr/press) x Weight % VOC x 8760 hr/yr x 1 ton/2000 lbs x Number of Presses

2. Potential to Emit HAP:

Type of Press	Mold Release Used*	Max. Usage (lbs/hr/press)	Number of Presses	Weight % Glycol Ether	PTE of Glycol Ether (tons/yr)
24" Compression Press	RR5	0.2220	43	0.00%	0.00
440 Desma Press	Monocoat 327W	0.2830	9	0.00%	0.00
Desma 160 ton Single Cavity	n/a	n/a	54	0.00%	0.00
Pin Boot Presses	McLube 1711L	0.1000	2	15.0%	0.13
Engel Air Seal Injection Presses	McLube 1711L	0.1000	3	15.0%	0.20
Lathe Cute Injection Press	McLube 1711L	0.1000	4	15.0%	0.26
24" Transfer Press	McLube 1711L	0.1000	12	15.0%	0.79
14" Compression Press	McLube 1711L	0.1000	2	15.0%	0.13
Desma 966	McLube 1711L	0.1000	2	15.0%	0.13
Lawton Presses	McLube 1711L	0.1000	2	15.0%	0.13
Total			**133**		**1.77**

* This is the worst case material for HAP emissions.

METHODOLOGY

PTE of HAP (tons/yr) = Max. Usage (lbs/hr/press) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs x Number of Presses

Appendix A: Emission Calculations
PM and PM10 Emissions
From Rubber Weighing and Loading Process

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Process Description	Max. Throughput Rate (lbs/hr)	Emission Factor* (lbs/lbs)	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)
Weighing/Loading	3,180	5.00E-04	1.59	6.96
Total				**6.96**

* Emission factor is estimated by the source based on the operation data from this source.

Methodology

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions
From Six (6) Gritblasters

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Type of Abrasive Used: Plastic Media

Unit ID	Max. Abrasive Input Rate (lbs/hr)	PM Emission Factor (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10 Emission Factor (lbs/lbs PM)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)	Control Device	Control Efficiency**	PTE of PM after Control (lbs/hr)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr)	PTE of PM10 after Control (tons/yr)
#52047001	529	0.010	5.29	23.2	0.70	3.70	16.2	dust collector	98.0%	0.11	0.46	0.07	0.32
#52966015	92.2	0.010	0.92	4.04	0.70	0.65	2.83	dust collector	98.0%	0.02	0.08	0.01	0.06
#52016017	268	0.010	2.68	11.7	0.70	1.88	8.22	dust collector	98.0%	0.05	0.23	0.04	0.16
#52966059	372	0.010	3.72	16.3	0.70	2.60	11.4	dust collector	98.0%	0.07	0.33	0.05	0.23
#52046018	743	0.010	7.43	32.5	0.70	5.20	22.8	dust collector	98.0%	0.15	0.65	0.10	0.46
#52016022	884	0.010	8.84	38.7	0.70	6.19	27.1	dust collector	98.0%	0.18	0.77	0.12	0.54
Total				**127**			**88.6**				**2.53**		**1.77**

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

** The control efficiency information is provided by the source.

Methodology
PTE = Potential to Emit

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)
PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor
PTE of PM/PM10 after Control = PTE of PM/PM10 before Control x (1 - Control Efficiency)

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Three (3) Adhesive Application Booths (Insignificant)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Material	Density (lbs/gal)	Weight % Organics	Maximum Throughput (unit/hr)*	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Weight % Soilds	PTE of PM/PM10 before Control (lbs/hr)**	PTE of PM/PM10 before Control (tons/yr)**	Transfer Efficiency (%)***
Chemlok 8003	8.62	2.00%	10,300	1.65E-06	0.17	2.93E-03	0.07	0.01	9.00%	0.01	0.03	40%
Chemlok 8200	8.74	3.40%	10,300	1.26E-06	0.30	3.86E-03	0.09	0.02	13.2%	0.01	0.04	40%
Robond 7015	8.42	2.00%	10,300	1.65E-05	0.17	2.86E-02	0.69	0.13	4.80%	0.04	0.18	40%
Robond 7021C	8.48	5.60%	10,300	1.65E-05	0.47	8.07E-02	1.94	0.35	8.40%	0.07	0.32	40%
PTE of one booth						**0.08**	**1.94**	**0.35**		**0.07**	**0.32**	
PTE of 3 booths						**0.24**	**5.81**	**1.06**		**0.22**	**0.95**	

* This information was provided by the source and is the maximum throughput rate for one booth.

**Assume all the PM emissions are PM10 emissions.

*** The transfer efficiency information is from AP-42, Table 4.2.2.11-1 for air atomized spray applications (AP-42, 01/95).

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (Weight % Solids) * (1-Transfer efficiency)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (Weight % Solids) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lbs)
PTE of one booth = the worst case emissions among all the coatings applied.

Appendix A: Emission Calculations
HAP Emissions
From Three (3) Adhesive Application Booths (Insignificant)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % Se	PTE of Se (tons/yr)	Weight % Phenol	PTE of Phenol (tons/yr)
Chemlok 8003	8.62	10,300	1.65E-06				
Chemlok 8200	8.74	10,300	1.26E-06	1.80%	8.94E-03		
Robond 7015	8.42	10,300	1.65E-05				
Robond 7021C	8.48	10,300	1.65E-05			5.0%	0.32
Total for one booth					**8.94E-03**		**0.32**
Total for 3 booths					**2.68E-02**		**0.95**

Total **0.97 (tons/yr)**

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Throughput (unit/hr) x Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs
PTE of one booth = the worst case emissions among all the coatings applied.

Appendix A: Emission Calculations
VOC and HAP Emissions
From Rubber Milling Process

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Max. Throughput Rate (lbs/hr): 618 (3 units combined)

	CAS No.	Emisson Factor* (lb/lb rubber)	PTE (tons/yr)
Total VOC		6.48E-04	**1.75**
Total HAPs		7.28E-05	**0.20**
1,1,1-Trichloroethane	71-55-6	3.79E-07	1.03E-03
1,1-Dichloroethene	75-35-4	1.14E-07	3.08E-04
1,2-Dichloroethane	107-06-2	4.06E-08	1.10E-04
1,3-Butadiene	106-99-0	2.42E-07	6.56E-04
1,4-Dichlorobenzene	106-46-7	2.32E-09	6.29E-06
2,4-Dinitrophenol	51-28-5	8.39E-09	2.27E-05
2-Butanone	78-93-3	3.07E-06	8.30E-03
2-Chloroacetophenone	532-27-4	2.83E-10	7.66E-07
2-Methylphenol	95-48-7	1.99E-08	5.40E-05
4-Aminobiphenyl	92-67-1	6.99E-11	1.89E-07
4-Methyl-2-Pentanone	108-10-1	1.59E-05	4.30E-02
4-Nitrophenol	100-02-7	5.13E-09	1.39E-05
Acetaldehyde	75-07-0	3.61E-07	9.76E-04
Acetaldehyde + Isobutane	0	3.17E-07	8.59E-04
Acetonitrile	75-05-8	2.40E-07	6.50E-04
Acetophenone	98-86-2	1.20E-06	3.25E-03
Acrolein	107-02-8	4.28E-07	1.16E-03
Acrylonitrile	107-13-1	6.09E-06	1.65E-02
Aniline	62-53-3	5.32E-06	1.44E-02
Benzene	71-43-2	3.43E-07	9.27E-04
Benzidine	92-87-5	9.34E-09	2.53E-05
Biphenyl	92-52-4	4.16E-08	1.13E-04
bis(2-Ethylhexyl)phthalate	117-81-7	8.63E-07	2.34E-03
Bromoform	75-25-2	1.44E-07	3.90E-04
Bromomethane	74-83-9	2.92E-08	7.89E-05
Carbon Disulfide	75-15-0	5.32E-05	1.44E-01
Carbon Tetrachloride	56-23-5	2.43E-05	6.57E-02
Carbonyl Sulfide	463-58-1	1.16E-05	3.15E-02
Chloroethane	75-00-3	8.82E-07	2.39E-03
Chloroform	67-66-3	3.37E-07	9.13E-04
Chloromethane	74-87-3	4.60E-07	1.24E-03
Cumene	98-82-8	1.65E-06	4.45E-03
Di-n-butylphthalate	84-74-2	1.73E-07	4.69E-04
Dibenzofuran	132-64-9	1.73E-08	4.68E-05
Dimethylaminoazobenzene	60-11-7	8.49E-09	2.30E-05
Dimethylphthalate	131-11-3	7.21E-08	1.95E-04
Ethyl Acrylate	140-88-5	2.45E-06	6.64E-03
Ethylbenzene	100-41-4	2.24E-06	6.07E-03
Hexachloroethane	67-72-1	6.39E-07	1.73E-03
Hexane	**110-54-3**	**5.85E-05**	**1.58E-01**
Hydroquinone	123-31-9	1.36E-05	3.68E-02
Isooctane	540-84-1	4.12E-07	1.12E-03
Isophorone	78-59-1	1.12E-05	3.03E-02
m-Xylene + p-Xylene	0	7.47E-06	2.02E-02
Methylene Chloride	75-09-2	8.58E-06	2.32E-02
N-Nitrosodimethylamine	62-75-9	1.21E-09	3.28E-06
Naphthalene	91-20-3	3.73E-07	1.01E-03
Nitrobenzene	98-95-3	1.05E-08	2.83E-05
o-Toluidine	95-53-4	1.16E-07	3.13E-04
o-Xylene	95-47-6	4.01E-06	1.09E-02
Pentachlorophenol	87-86-5	6.49E-09	1.76E-05
Phenol	108-95-2	6.58E-07	1.78E-03
Propanal	123-38-6	1.72E-06	4.67E-03
Propylene Oxide	75-56-9	3.61E-06	9.78E-03
Styrene	100-42-5	2.20E-06	5.97E-03
t-Butyl Methyl Ether	1634-04-4	4.14E-06	1.12E-02
Tetrachloroethene	127-18-4	9.91E-07	2.68E-03
Toluene	108-88-3	1.20E-05	3.24E-02
Trichloroethene	79-01-6	1.15E-07	3.11E-04
Vinyl Acetate	108-05-4	1.22E-06	3.29E-03
Vinyl Chloride	75-01-4	6.83E-09	1.85E-05

*Emission factors are from draft AP-42, Chapter 4.12 (AP-42, 06/99) and are the worst case scenario among all types of rubbers processed at this source.

Methodology
PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and HAP Emissions
From Rubber Extruding Process

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Max. Throughput Rate (lbs/hr): 2,748 (5 units combined)

	CAS No.	Emisson Factor* (lb/lb rubber)	PTE (tons/yr)
Total VOC		1.06E-04	**1.28**
Total HAPs		7.53E-05	**0.91**
1,1,1-Trichloroethane	71-55-6	3.92E-07	4.72E-03
1,1-Dichloroethene	75-35-4	1.17E-07	1.41E-03
1,3-Butadiene	106-99-0	5.06E-07	6.09E-03
1,4-Dichlorobenzene	106-46-7	8.36E-09	1.01E-04
1,4-Dioxane	123-91-1	1.67E-07	2.01E-03
2,4-Dinitrophenol	51-28-5	8.67E-09	1.04E-04
2-Butanone	78-93-3	3.17E-06	3.81E-02
2-Chloroacetophenone	532-27-4	6.48E-09	7.80E-05
2-Methylphenol	95-48-7	4.63E-08	5.57E-04
4-Methyl-2-Pentanone	108-10-1	6.73E-06	8.09E-02
4-Nitrophenol	100-02-7	5.30E-09	6.38E-05
Acetaldehyde	75-07-0	3.73E-07	4.49E-03
Acetaldehyde + Isobutane		3.28E-07	3.95E-03
Acetonitrile	75-05-8	2.48E-07	2.99E-03
Acetophenone	98-86-2	8.18E-06	9.85E-02
Acrolein	107-02-8	4.42E-07	5.32E-03
Acrylonitrile	107-13-1	6.29E-06	7.57E-02
Aniline	62-53-3	5.08E-07	6.12E-03
Benzene	71-43-2	3.54E-07	4.26E-03
Benzidine	92-87-5	1.26E-08	1.51E-04
Biphenyl	92-52-4	3.02E-08	3.63E-04
bis(2-Ethylhexyl)phthalate	117-81-7	3.96E-07	4.77E-03
Bromoform	75-25-2	1.49E-07	1.79E-03
Bromomethane	74-83-9	3.01E-08	3.63E-04
Cadmium (Cd) Compounds		5.01E-09	6.03E-05
Carbon Disulfide	75-15-0	5.49E-05	6.61E-01
Carbon Tetrachloride	56-23-5	2.51E-05	3.02E-01
Carbonyl Sulfide	463-58-1	1.20E-05	1.45E-01
Chloroethane	75-00-3	9.12E-07	1.10E-02
Chloroform	67-66-3	3.49E-07	4.20E-03
Chloromethane	74-87-3	4.75E-07	5.72E-03
Chromium (Cr) Compounds		2.54E-07	3.05E-03
Cobalt (Co) Compounds		1.90E-08	2.29E-04
Cumene	98-82-8	1.82E-06	2.19E-02
Di-n-butylphthalate	84-74-2	3.65E-07	4.39E-03
Dibenzofuran	132-64-9	1.83E-08	2.20E-04
Dimethylaminoazobenzene	60-11-7	8.77E-09	1.06E-04
Dimethylphthalate	131-11-3	8.43E-09	1.01E-04
Ethyl Acrylate	140-88-5	2.53E-06	3.05E-02
Ethylbenzene	100-41-4	2.32E-06	2.79E-02
Hexachlorobenzene	118-74-1	4.98E-09	5.99E-05
Hexachlorobutadiene	87-68-3	1.72E-07	2.08E-03
Hexachloroethane	67-72-1	6.60E-07	7.94E-03
Hexane	**110-54-3**	**6.05E-05**	**7.28E-01**
Hydroquinone	123-31-9	1.41E-05	1.69E-01
Isooctane	540-84-1	4.12E-07	4.96E-03
Isophorone	78-59-1	3.55E-07	4.28E-03
Lead (Pb) Compounds		1.09E-08	1.31E-04
m-Xylene + p-Xylene		7.72E-06	9.30E-02
Methylene Chloride	75-09-2	2.07E-05	2.49E-01
N,N-Dimethylaniline	121-69-7	5.45E-09	6.56E-05
Naphthalene	91-20-3	1.96E-06	2.36E-02
Nickel (Ni) Compounds		4.91E-07	5.90E-03
Nitrobenzene	98-95-3	1.08E-08	1.30E-04
o-Toluidine	95-53-4	1.50E-07	1.80E-03
o-Xylene	95-47-6	4.14E-06	4.99E-02
Pentachlorophenol	87-86-5	6.70E-09	8.07E-05
Phenol	108-95-2	6.80E-07	8.19E-03
Propanal	123-38-6	1.78E-06	2.15E-02
Propylene Oxide	75-56-9	3.73E-06	4.49E-02
Styrene	100-42-5	7.25E-07	8.72E-03
t-Butyl Methyl Ether	1634-04-4	4.28E-06	5.15E-02
Tetrachloroethene	127-18-4	2.20E-06	2.64E-02
Toluene	108-88-3	1.24E-05	1.49E-01
Trichloroethene	79-01-6	3.30E-07	3.97E-03
Vinyl Acetate	108-05-4	1.26E-06	1.51E-02
Vinyl Chloride	75-01-4	3.26E-08	3.92E-04

*Emission factors are from draft AP-42, Chapter 4.12 (AP-42, 06/99) and are the worst case scenario among all types of rubbers processed at this source.

Methodology
PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
From the Two (2) Parts Washers (Insignificant)

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Unit	Solvent Used*	Density (lbs/gal)	Weight % VOC	Maximum Usage (gal/day)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Model 33	Safety Kleen 150	6.65	100%	0.07	0.47	0.09
Model 14	Safety Kleen 150	6.65	100%	0.03	0.18	0.03
Total						**0.12**

* These solvents do not contain any regulated HAPs.

METHODOLOGY

PTE of VOC (lbs/day) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/day)
PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Max. Usage (gal/day) x 365 day/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Twenty-Seven (27) Insignificant NG Fired Units

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
23.0	(27 units total)	201.5

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lbs/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	**0.77**	**0.77**	**0.06**	**10.1**	**0.55**	**8.46**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission factors for NO_x: Uncontrolled = 100 lbs/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
From the Plastic Pressing Operations

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Material Used	Max. Usage* (lbs/hr)	Weight % VOC	PTE of VOC (tons/yr)
Pellet Plastic	19.25	0.05%	0.042
E236 Mold Release	5.87E-02	50.0%	0.129
MC-16	9.78E-03	99.0%	0.042
Total for 1 press			**0.21**
Total for 8 press			**1.70**

* This information is provided by the source based on the maximum capacity for the biggest units.

METHODOLOGY

PTE of VOC (tons/yr) = Max. Usage (lbs/hr) x Weight % VOC x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
From the Plastic Post Curing

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Material Used	Max. Usage* (lbs/hr)	Emission Factor (lbs/lbs)	PTE of VOC (tons/yr)
Pellet Plastic	20.83	0.0005	0.05
Total			**0.05**

* This information is provided by the source based on the maximum capacity for the biggest units.

METHODOLOGY

PTE of VOC (tons/yr) = Max. Usage (lbs/hr) x Weight % VOC x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC Emissions
From the Usage of Release in Rubber Cooling Carousel

Company Name: Freudenberg-NOK General Partnership
Address: 821 South Lake Rd., Scottsburg, IN 47170
FESOP: 143-21240-00010
Reviewer: ERG/YC
Date: August 10, 2005

Material Used	Max. Throughput Rate (lbs/hr)	Release Usage Factor (lbs/lbs)*	Weight % VOC	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Release 105-W	2,000	2.04E-03	2.1%	2.06	0.38
Polycoat AB	2,000	2.04E-03	0.0%	0.00	0.00
RLS-40	2,000	2.04E-03	1.0%	0.98	0.18
Worst Case					**0.38**

* This information is provided by the source based on the acutal release usage at this source.

METHODOLOGY

PTE of VOC (lbs/day) = Max. Throughput Rate (lbs/hr) x Release Usage Factor (lbs/lbs) x Weight % VOC
PTE of VOC (tons/yr) = PTE of VOC (lbs/day) x 365 day/yr x 1 ton/2000 lbs