



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: April 17, 2006

RE: Nishikawa Standard Company / 087-21424-00031

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Nishikawa Standard Company
324 Morrow Street
Topeka, Indiana 46571**

(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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---------------------------------|
| Operation Permit No.: T087-21424-00031 | |
| Issued by: | Issuance Date: April 17, 2006 |
| Original signed by Paul Dubenetzky Acting Assistant Commissioner Office of Air Quality | Expiration Date: April 17, 2011 |

TABLE OF CONTENTS

| | | |
|----------|---|-----------|
| A | SOURCE SUMMARY | 5 |
| A.1 | General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)] | |
| A.3 | Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] | |
| A.4 | Part 70 Permit Applicability [326 IAC 2-7-2] | |
| B | GENERAL CONDITIONS | 11 |
| B.1 | Definitions [326 IAC 2-7-1] | |
| B.2 | Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)] | |
| B.3 | Term of Conditions [326 IAC 2-1.1-9.5] | |
| B.4 | Enforceability [326 IAC 2-7-7] | |
| B.5 | Severability [326 IAC 2-7-5(5)] | |
| B.6 | Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)] | |
| B.7 | Duty to Provide Information [326 IAC 2-7-5(6)(E)] | |
| B.8 | Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)] | |
| B.9 | Annual Compliance Certification [326 IAC 2-7-6(5)] | |
| B.10 | Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3] | |
| B.11 | Emergency Provisions [326 IAC 2-7-16] | |
| B.12 | Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12] | |
| B.13 | Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5] | |
| B.14 | Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)] | |
| B.15 | Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)] | |
| B.16 | Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9] | |
| B.17 | Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)] | |
| B.18 | Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] | |
| B.19 | Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)] | |
| B.20 | Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5] | |
| B.21 | Source Modification Requirement [326 IAC 2-7-10.5] | |
| B.22 | Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2] | |
| B.23 | Transfer of Ownership or Operational Control [326 IAC 2-7-11] | |
| B.24 | Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7] | |
| B.25 | Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6] | |
| C | SOURCE OPERATION CONDITIONS..... | 21 |
| | Emission Limitations and Standards [326 IAC 2-7-5(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] | |
| C.2 | Opacity [326 IAC 5-1] | |
| C.3 | Open Burning [326 IAC 4-1] [IC 13-17-9] | |
| C.4 | Incineration [326 IAC 4-2] [326 IAC 9-1-2] | |
| C.5 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.6 | Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] | |
| | Testing Requirements [326 IAC 2-7-6(1)] | |
| C.7 | Performance Testing [326 IAC 3-6] | |

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS: Spray booths and application lines 27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6][326 IAC 2-2]

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

D.1.6 VOC and HAP Emissions

D.1.7 Particulate Matter (PM) [326 IAC 6-3-2(d)]

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

D.1.8 Record Keeping Requirements

D.1.9 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS: Extrusion lines 32

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

D.3 FACILITY OPERATION CONDITIONS - Mixing Departments 36

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Compliance Determination Requirements

D.3.2 Particulate Matter

| | | |
|------------|--|--------------|
| D.4 | FACILITY OPERATION CONDITIONS - Insignificant Activities..... | 37 |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| | D.4.1 Particulate [326 IAC 6-3-2] | |
| | Certification | 38 |
| | Emergency Occurrence Report | 39 |
| | Quarterly Reports..... | 41-44 |
| | Quarterly Deviation and Compliance Monitoring Report | 45 |

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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates an extruded rubber seals manufacturing source.

| | |
|------------------------------|--|
| Responsible Official: | General Plants Manager |
| Source Address: | 324 Morrow Street, Topeka, Indiana 46571 |
| Mailing Address: | 324 Morrow Street, Topeka, Indiana 46571 |
| General Source Phone Number: | (260) 593-2156 |
| SIC Code: | 3061 |
| County Location: | LaGrange |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act |

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

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

- (a) One (1) spray coating line, identified as emission unit X025 (Large Robot), constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) Line 2 spray booth, identified as emission unit X029, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) Line 3 spray booth coating extruded rubber parts, identified as emission unit X030, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit X031, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.

- (e) One (1) Line 6 spray booth, identified as X032, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVL) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) Two (2) CV finishing touchup stations coating extruded rubber parts, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (g) One (1) SDM EB silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators coating extruded rubber parts and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (h) One (1) urethane application line (CV Line 9), identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (i) One (1) SDM EC urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns coating extruded rubber parts and one (1) blown air dryer, one (1) 1.0 million British thermal unit per hour natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (j) One (1) urethane application line (Line 8), identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (k) One (1) Line 4 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X026, constructed in 2001, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (l) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X027, constructed in 2001, equipped with spray guns and dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (m) One (1) waterborne urethane coating booth (Small Robot #1) coating extruded rubber parts, identified as emission unit X028, constructed in 1999, equipped with spray guns and dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (n) One (1) spray line identified as X034 (SDM-ED Line), constructed in 2002, equipped with six (6) High Volume Low Pressure (HVL) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 million British thermal unit per hour exhausting to stacks PEF-E4 and PEF-E5.
- (o) One (1) surface coating line (Small Robot #2), identified as X003, constructed in 2004, including:
 - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVL) spray gun coating extruded rubber parts, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and

- (2) one (1) electric curing oven.
- (p) Line 10 comprised of the following:
 - (1) One (1) spray line, identified as X039, constructed in 2004, equipped with four (4) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
 - (2) One (1) spray line, identified as X040, constructed in 2004, equipped with two (2) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun; and
 - (3) One (1) infrared cure oven at spray lines X039 and X040, exhausting to Stack PEF-A31.
- (q) One (1) spray line, identified as X036 (SDM-EE Line), constructed in 2002, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, exhausting to Stacks PEF-E11 and PEF-E12, respectively, capacity: 10 grams per minute of coating per gun.
- (r) One (1) spray line, identified as X037 (SDM-EA Line), constructed in 2004, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 million British thermal unit per hour each and exhausting to stacks PEF-B11 and PEF-B12.
- (s) One (1) CV extrusion line (CV line 1), identified as emission unit X005, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t) One (1) CV extrusion line (CV line 2), identified as emission unit X006, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line (CV line 3), identified as emission unit X007, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line (CV line 4), identified as emission unit X008, constructed in 1988, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.

- (w) One (1) CV extrusion line (CV line 5), identified as emission unit X009, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A10, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A18, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line (CV line 6), identified as emission unit X010, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A15, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (y) One (1) CV extrusion line (CV line 7), identified as emission unit X011, constructed in 1991, equipped with three (3) extruders, and one (1) duster vented internally, one (1) curing oven exhausting to stack PEF-A5, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (z) One (1) CV extrusion line (CV line 8), identified as emission unit X012, constructed in 1995, equipped with four (4) extruders and four (4) strip feeders vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (aa) One (1) CV extrusion line (CV line 9), identified as emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, and one (1) duster controlled by one (1) dust collector (DC-3) vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (bb) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 2004, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour each, exhausting to vents PEV-B7 and PEV-B9, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 million British thermal unit per hour each, exhausting to vents PEV-B6 and PEF-B3, four (4) extruders, four (4) strip feeders, one (1) plasma arc generator, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 million British thermal unit per hour each, and exhausting to vent PEF-B9.
- (cc) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

- (dd) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (ee) One (1) SDM ED extrusion line, identified as emission unit X033, constructed in 2002, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour, exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 million British thermal unit per hour exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 million British thermal unit per hour and exhausting to stack PEF-E6.
- (ff) One (1) SDM EE extrusion line, identified as emission unit X035, constructed in 2002, with a capacity of 1,289 pounds of rubber per hour, including:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to vents PEV-E3 and PEV-E4, capacity: 0.143 million British thermal unit per hour, each.
 - (2) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to stacks PEF-E7 and PEF-E8, capacity: 0.850 million British thermal unit per hour, each.
 - (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.
- (gg) One (1) CV extrusion line (CV Line 10), identified as X038, constructed in 2004, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
 - (5) Three (3) extruders and three (3) strip feeders.
- (hh) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station and one (1) raw chemical weigh station, both exhausting to a small baghouse identified as CE-02, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Tumblers [326 IAC 6-3]
- (b) Dango Mixing Mills B and F, each with a dispersion system, using particulate filters as control [326 IAC 6-3]
- (c) Color Mixing Mill [326 IAC 6-3]
- (d) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (e) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (f) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (g) Dango Barwell Extruders [326 IAC 6-3]
- (h) Polymer Block Cutting Station [326 IAC 6-3]
- (i) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (j) Weld Shop Equipment [326 IAC 6-3]
- (k) Silicone Coating Mixing Station [326 IAC 6-3]
- (l) Die Room Metalworking Equipment [326 IAC 6-3]
- (m) SDM Mezzanine Units [326 IAC 6-3]
- (n) Barwell Warm-Up Mill [326 IAC 6-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T087-21424-00031, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability [326 IAC 2-7-7]

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 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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. All 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 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 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 46204-2251

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.
 - (g) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T087-21424-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Testing Requirements [326 IAC 2-7-6(1)]

C.7 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 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 15, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray coating line, identified as emission unit X025 (Large Robot), constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) Line 2 spray booth, identified as emission unit X029, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) Line 3 spray booth coating extruded rubber parts, identified as emission unit X030, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit X031, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) Line 6 spray booth, identified as X032, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) Two (2) CV finishing touchup stations coating extruded rubber parts, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (g) One (1) SDM EB silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators coating extruded rubber parts and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (h) One (1) urethane application line (CV Line 9), identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (i) One (1) SDM EC urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns coating extruded rubber parts and one (1) blown air dryer, one (1) 1.0 million British thermal unit per hour natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (j) One (1) urethane application line (Line 8), identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.

- (k) One (1) Line 4 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X026, constructed in 2001, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (l) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X027, constructed in 2001, equipped with spray guns and dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (m) One (1) waterborne urethane coating booth (Small Robot #1) coating extruded rubber parts, identified as emission unit X028, constructed in 1999, equipped with spray guns and dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (n) One (1) spray line identified as X034 (SDM-ED Line), constructed in 2002, equipped with six (6) High Volume Low Pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 million British thermal unit per hour exhausting to stacks PEF-E4 and PEF-E5.
- (o) One (1) surface coating line (Small Robot #2), identified as X003, constructed in 2004, including:
 - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun coating extruded rubber parts, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
 - (2) one (1) electric curing oven.
- (p) Line 10 comprised of the following:
 - (1) One (1) spray line, identified as X039, constructed in 2004, equipped with four (4) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
 - (2) One (1) spray line, identified as X040, constructed in 2004, equipped with two (2) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun; and
 - (3) One (1) infrared cure oven at spray lines X039 and X040, exhausting to Stack PEF-A31.
- (q) One (1) spray line, identified as X036 (SDM-EE Line), constructed in 2002, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, exhausting to Stacks PEF-E11 and PEF-E12, respectively, capacity: 10 grams per minute of coating per gun.
- (r) One (1) spray line, identified as X037 (SDM-EA Line), constructed in 2004, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 million British thermal unit per hour each and exhausting to stacks PEF- B11 and PEF-B12.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply to that emission unit.
- (b) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the one (1) silicone application line (X019) shall be as follows:
- (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, and two (2) spray lines (X-039 and X-040) shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. This limit also renders the requirements of 326 IAC 2-2 not applicable because this 148 tons per year VOC limitation, in combination with the VOC emissions of 96.47 tons per year from extruding and curing, 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.12 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year.
 - (2) All coating, urethane and silicone application devices at these facilities shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
 - (3) All VOC containing containers shall be kept covered when not in use.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, each individual hazardous air pollutant (HAP) delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the amount of that HAP recovered, shall be limited to less than ten (10) tons per consecutive twelve (12) month period with compliance determined at the end of each month.
- (b) Pursuant to CP 087-9388-00031, issued on January 28, 1999, any combination of HAPs delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the total HAPs recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, individual hazardous air pollutant (HAP) and combined HAPs usage for the most recent twelve (12) month period.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and the HAP emission limits established in Condition D.1.2.

- (1) The amount and HAP content of each coating material and solvent used at the one (1) spray coating line, identified as emission unit X025. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The cleanup solvent usage for each month;
- (3) The individual and total HAP usage for each month; and
- (4) The weight of individual and total HAPs emitted for each compliance period.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (s) One (1) CV extrusion line (CV line 1), identified as emission unit X005, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t) One (1) CV extrusion line (CV line 2), identified as emission unit X006, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line (CV line 3), identified as emission unit X007, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line (CV line 4), identified as emission unit X008, constructed in 1988, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line (CV line 5), identified as emission unit X009, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A10, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A18, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line (CV line 6), identified as emission unit X010, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A15, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (y) One (1) CV extrusion line (CV line 7), identified as emission unit X011, constructed in 1991, equipped with three (3) extruders, and one (1) duster vented internally, one (1) curing oven exhausting to stack PEF-A5, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (z) One (1) CV extrusion line (CV line 8), identified as emission unit X012, constructed in 1995, equipped with four (4) extruders and four (4) strip feeders vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.

- (aa) One (1) CV extrusion line (CV line 9), identified as emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, and one (1) duster controlled by one (1) dust collector (DC-3) vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (bb) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 2004, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour each, exhausting to vents PEV-B7 and PEV-B9, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 million British thermal unit per hour each, exhausting to vents PEV-B6 and PEF-B3, four (4) extruders, four (4) strip feeders, one (1) plasma arc generator, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 million British thermal unit per hour each, and exhausting to vent PEF-B9.
- (cc) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (dd) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (ee) One (1) SDM ED extrusion line, identified as emission unit X033, constructed in 2002, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour, exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 million British thermal unit per hour exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 million British thermal unit per hour and exhausting to stack PEF-E6.
- (ff) One (1) SDM EE extrusion line, identified as emission unit X035, constructed in 2002, with a capacity of 1,289 pounds of rubber per hour, including:
- (1) Two (2) natural gas-fired microwave curing ovens, exhausting to vents PEV-E3 and PEV-E4, capacity: 0.143 million British thermal unit per hour, each.
 - (2) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to stacks PEF-E7 and PEF-E8, capacity: 0.850 million British thermal unit per hour, each.

- (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.
- (gg) One (1) CV extrusion line (CV Line 10), identified as X038, constructed in 2004, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
- (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
 - (5) Three (3) extruders and three (3) strip feeders.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on 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

| Emission Unit | Process Weight Rate (tons per hour) | Allowable PM Emission Rate [326 IAC 6-3-2] (pounds per hour) |
|--------------------------|-------------------------------------|--|
| CV Extrusion Line (X005) | 0.101 | 0.882 |
| CV Extrusion Line (X006) | 0.101 | 0.882 |
| CV Extrusion Line (X007) | 0.101 | 0.882 |
| CV Extrusion Line (X008) | 0.101 | 0.882 |
| CV Extrusion Line (X009) | 0.201 | 1.40 |
| CV Extrusion Line (X010) | 0.201 | 1.40 |
| CV Extrusion Line (X011) | 0.301 | 1.83 |
| CV Extrusion Line (X012) | 0.201 | 1.40 |

| Emission Unit | Process Weight Rate (tons per hour) | Allowable PM Emission Rate [326 IAC 6-3-2] (pounds per hour) |
|--------------------------|--|---|
| CV Extrusion Line (X013) | 0.201 | 1.40 |
| CV Extrusion Line (X014) | 0.65 | 3.05 |
| CV Extrusion Line (X015) | 0.60 | 2.91 |
| CV Extrusion Line (X016) | 0.60 | 2.91 |
| CV Extrusion Line (X033) | 0.65 | 3.05 |
| CV Extrusion Line (X035) | 0.65 | 3.05 |
| CV Extrusion Line (X038) | 0.375 | 2.91 |

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(hh) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station and one (1) raw chemical weigh station, both exhausting to a small baghouse identified as CE-02, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the facilities listed below shall be limited as stated, based on 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:

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

| Emission Unit | Process Weight Rate (tons per hour) | Allowable PM Emission Rate [326 IAC 6-3-2] (pounds per hour) |
|--------------------------|-------------------------------------|--|
| Mixing department (X018) | 0.25 | 1.63 |

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

In order to comply with Condition D.3.1, the baghouse (CE-02) for PM control shall be in operation and control emissions from the mixing department at all times that the mixing department is in operation.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (a) Tumblers [326 IAC 6-3]
- (b) Dango Mixing Mills B and F, each with a dispersion system, using particulate filters as control [326 IAC 6-3]
- (c) Color Mixing Mill [326 IAC 6-3]
- (d) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (e) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (f) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (g) Dango Barwell Extruders [326 IAC 6-3]
- (h) Polymer Block Cutting Station [326 IAC 6-3]
- (i) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (j) Weld Shop Equipment [326 IAC 6-3]
- (k) Silicone Coating Mixing Station [326 IAC 6-3]
- (l) Die Room Metalworking Equipment [326 IAC 6-3]
- (m) SDM Mezzanine Units [326 IAC 6-3]
- (n) Barwell Warm-Up Mill [326 IAC 6-3]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from each of the insignificant activities shall not exceed the allowable PM emission rate based on 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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: Same as above
Part 70 Permit No.: T087-21424-00031

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: Same as above
Part 70 Permit No.: T087-21424-00031

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C 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); andC 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 |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
 Source Address: 324 Morrow Street, Topeka, Indiana 46571
 Mailing Address: Same as above
 Part 70 Permit No.: T087-21424-00031
 Facilities: One (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, and two (2) spray lines (X-039 and X-040)
 Parameter: Total Volatile Organic Compounds (VOC) Usage
 Limit: Less than 148 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 |
|---------|-----------------------------------|---|---------------------------------|
| | Total VOC Usage This Month (tons) | Total VOC Usage Previous 11 Months (tons) | 12 Month Total VOC Usage (tons) |
| 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

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
 Source Address: 324 Morrow Street, Topeka, Indiana 46571
 Mailing Address: Same as above
 Part 70 Permit No.: T087-21424-00031
 Facilities: One (1) spray coating line (X025)
 Parameter: Volatile Organic Compounds (VOC) Usage = VOC delivered to the applicators – VOC recovered
 Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|-----------------------------------|---|---------------------------------|
| | Total VOC Usage This Month (tons) | Total VOC Usage Previous 11 Months (tons) | 12 Month Total VOC Usage (tons) |
| 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

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: Same as above
Part 70 Permit No.: T087-21424-00031
Facilities: One (1) spray coating line (X025)
Parameter: Individual HAP Usage = HAP delivered to the applicators – HAP recovered
Limit: Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|--|--|--------------------------------------|
| | Individual HAP Usage This Month (tons) | Individual HAP Usage Previous 11 Months (tons) | 12 Month Individual HAP Usage (tons) |
| 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

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: Same as above
Part 70 Permit No.: T087-21424-00031
Facilities: One (1) spray coating line (X025)
Parameter: Total HAP Usage = HAPs delivered to the applicators – HAPs recovered
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------------------------------|--|----------------------------------|
| | Total HAPs Usage This Month (tons) | Total HAPs Usage Previous 11 Months (tons) | 12 Month Total HAPs Usage (tons) |
| 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**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nishikawa Standard Company
 Source Address: 324 Morrow Street, Topeka, Indiana 46571
 Mailing Address: Same as above
 Part 70 Permit No.: T087-21424-00031

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 "No deviations occurred this reporting period". | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> 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**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

| | |
|--|---|
| Source Name: | Nishikawa Standard Company |
| Source Location: | 324 Morrow Street, Topeka, Indiana 46571 |
| County: | LaGrange |
| SIC Code: | 3061 |
| Operation Permit No.: | T 087-7182-00031 |
| Operation Permit Issuance Date: | April 12, 2001 |
| Permit Renewal No.: | 087-21424-00031 |
| Permit Reviewer: | GS/EVP |

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Nishikawa Standard Company relating to the operation of an extruded rubber seals manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) Line 2 spray booth, identified as emission unit X029, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) Line 3 spray booth coating extruded rubber parts, identified as emission unit X030, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit X031, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) Line 6 spray booth, identified as X032, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.

- (f) Two (2) CV finishing touchup stations coating extruded rubber parts, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (g) One (1) SDM EB silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators coating extruded rubber parts and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (h) One (1) urethane application line (CV Line 9), identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (i) One (1) SDM EC urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns coating extruded rubber parts and one (1) blown air dryer, one (1) 1.0 million British thermal unit per hour natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (j) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (k) One (1) Line 4 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X026, constructed in 2001, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (l) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X027, constructed in 2001, equipped with spray guns and dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (m) One (1) waterborne urethane coating booth (Small Robot #1) coating extruded rubber parts, identified as emission unit X028, constructed in 1999, equipped with spray guns and dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (n) One (1) spray line identified as X034, constructed in 2002, equipped with six (6) High Volume Low Pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 million British thermal unit per hour exhausting to stacks PEF-E4 and PEF-E5.
- (o) One (1) surface coating line (Small Robot #2), identified as X003, constructed in 2004, including:
 - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun coating extruded rubber parts, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
 - (2) one (1) electric curing oven.

- (p) One (1) spray line, identified as X039, constructed in 2004, equipped with four (4) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (q) One (1) spray line, identified as X040, constructed in 2004, equipped with two (2) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
- (r) One (1) infrared cure oven at spray lines X039 and X040, exhausting to Stack PEF-A31.
- (s) One (1) spray line, identified as X036, constructed in 2002, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, exhausting to Stacks PEF-E11 and PEF-E12, respectively, capacity: 10 grams per minute of coating per gun.
- (t) One (1) spray line, identified as X037, constructed in 2004, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 million British thermal unit per hour each and exhausting to stacks PEF-B11 and PEF-B12.
- (u) One (1) CV extrusion line (CV line 1), identified as emission unit X005, constructed in 1987, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A3, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line (CV line 2), identified as emission unit X006, constructed in 1987, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A3, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line (CV line 3), identified as emission unit X007, constructed in 1987, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A3, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line (CV line 4), identified as emission unit X008, constructed in 1988, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A3, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A3, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (y) One (1) CV extrusion line (CV line 5), identified as emission unit X009, constructed in 1989, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A10, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A18, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.

- (z) One (1) CV extrusion line (CV line 6), identified as emission unit X010, constructed in 1989, equipped with extruders, strip feeders, dusters, curing ovens exhausting to stack PEF-A15, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (aa) One (1) CV extrusion line (CV line 7), identified as emission unit X011, constructed in 1991, equipped with three (3) extruders, one (1) duster, one (1) curing oven exhausting to stack PEF-A5, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (bb) One (1) CV extrusion line (CV line 8), identified as emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) electroless dusters, four (4) strip feeders, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (cc) One (1) CV extrusion line (CV line 9), identified as emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (dd) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 2004, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour each, exhausting to vents PEV-B7 and PEV-B9, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 million British thermal unit per hour each, exhausting to vents PEV-B6 and PEF-B3, four (4) extruders, four (4) strip feeders, one (1) plasma arc generator, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 million British thermal unit per hour each, and exhausting to vent PEF-B9.
- (ee) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, two (2) sponge extruder feed hoppers, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (ff) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack

PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

- (gg) One (1) SDM ED extrusion line, identified as emission unit X033, constructed in 2002, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour, exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 million British thermal unit per hour exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 million British thermal unit per hour and exhausting to stack PEF-E6.
- (hh) One (1) SDM EE extrusion line, identified as emission unit X035, constructed in 2002, with a capacity of 1,289 pounds of rubber per hour, including:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to vents PEV-E3 and PEV-E4, capacity: 0.143 million British thermal unit per hour, each.
 - (2) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to stacks PEF-E7 and PEF-E8, capacity: 0.850 million British thermal unit per hour, each.
 - (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.
- (ii) One (1) CV extrusion line (CV Line 10), identified as X038, constructed in 2004, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
 - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
 - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
 - (3) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
 - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
- (jj) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station and one (1) raw chemical weigh station, both exhausting to a small baghouse identified as CE-02, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating 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) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]

- (b) Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F, each with a dispersion system, using particulate filters as control [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Insetter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) Silicone Coating Mixing Station [326 IAC 6-3]
- (m) Die Room Metalworking Equipment [326 IAC 6-3]
- (n) SDM Mezzanine Units [326 IAC 6-3]
- (o) Barwell Warm-Up Mill [326 IAC 6-3]

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 operating Permit No. T087-7182-00031, issued on April 12, 2001;
- (b) First Significant Source Modification No. 087-12244-00031, issued on July 19, 2000;
- (c) First Minor Permit Modification No. 087-14376-00031, issued on July 20, 2001;
- (d) First Minor Source Modification No. 087-14331-00031, issued on July 24, 2001;
- (e) First Administrative Amendment No. 087-15216-00031, issued on January 24, 2002;
- (f) Second Minor Source Modification No. 087-16188-00031, issued on November 27, 2002;
- (g) First Significant Permit Modification No. 087-16667-00031, issued on January 16, 2003;
- (h) Third Minor Source Modification No. 087-18586-00031, issued on June 4, 2004;
- (i) Second Minor Permit Modification No. 087-18821-00031, issued on June 24, 2004;
- (j) Second Significant Permit Modification No. 087-19170-00031, issued on September 9, 2004; and
- (k) Second Administrative Amendment No. 087-20980-00031, issued on April 6, 2005.

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

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) *Part 70 Significant Permit Modification No. T087-19170-00031, Condition D.1.1 (c)(1), Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]*

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

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- (c) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the two (2) silicone application lines (X001 and X019) shall be as follows:
 - (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth, three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, and two (2) spray lines (X-039 and X-040) shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. This 148 tons per year VOC limitation, in combination with the VOC emissions of 96.47 tons per year from extruding and curing, 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.12 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. This limit shall also satisfy the BACT requirements, pursuant to 326 IAC 8-1-6.

Reason Revised: The silicone application line 1, identified as X001, and portable spray booth, identified as X024, were removed from the source. Therefore, this condition is revised to remove reference to these facilities.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) *Part 70 Significant Permit Modification No. T087-19170-00031, Condition D.1.3, Particulate Matter (PM) [326 IAC 6-3-2]*

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) The PM from the one (1) spray coating line (X025), one (1) surface coating line (X-033), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth, three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) and spray line X-034 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the spray line, identified as X-037 shall be considered in compliance with this rule using either dry filters, waterwash, or an equivalent control; and the owner or operator shall operate the control device in accordance with the manufacturer's specifications.

Reason Not Incorporated: 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. Therefore, this condition is not included in this permit. Pursuant to 326 IAC 6-3-2 (d), the particulate control requirements for surface coating processes are included in the permit.

- (b) *Part 70 Significant Permit Modification No. T087-19170-00031, Condition D.1.9 (c), Recordkeeping Requirements*

D.1.9 Record Keeping Requirements

- (c) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Reason Not Incorporated: Since there is not a requirement to do weekly observations of the overspray in the permit, there should not be a requirement to maintain a log of weekly overspray observations. The Permittee shall only need to record the action taken when overspray is visibly detected. Therefore, this requirement is not included in the permit.

- (c) *Part 70 No. T087-7182-00031, Condition D.4.2, Volatile Organic Compounds (VOC)*

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the two (2) insignificant cold cleaners shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

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

Reason Not Incorporated: The insignificant cold cleaners were removed from the source. Therefore, 326 IAC 8-3-2 (Cold Cleaner Operations) is not applicable to any facility at the source and this condition is not included in the permit.

- (d) *Part 70 No. T087-7182-00031, Condition D.1.1 (b), Volatile Organic Compounds (VOC)*
Part 70 Significant Permit Modification No. T087-19170-00031, Conditions D.1.1 (d), (e), (f), (g) and (h), Volatile Organic Compounds (VOC)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

- (b) Any change or modification at the spray booths (Lines 2, 3, 5 and 6), two (2) CV finishing touchup stations (X004), urethane application lines (X020, X021, X023), the portable spray booth or the three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) that may increase the potential to emit VOC at any facility to twenty-five (25) tons per year or more shall cause the source to become subject to 326 IAC 8-1-6 and prior approval is required.

- (d) Any change or modification which may increase the VOC potential emissions from spray line, X-034 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.

- (e) Any change or modification which may increase the VOC potential emissions from spray line, X-036 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.

- (f) Any change or modification which may increase the VOC potential emissions from spray line, X-037 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.

- (g) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-039 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.

- (h) Any change or modification which may increase the VOC potential emissions from the spray line identified as X-040 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (New facilities; General reduction requirements) and shall require prior IDEM, OAQ approval.

Reason Not Incorporated: Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), any change or modification which may increase the VOC potential emissions to 25 tons per year or greater shall go through prior IDEM, OAQ review and receive approval. Therefore, the above requirements are not required and are not included in the permit.

(e) *Part 70 No. T087-7182-00031, Condition D.1.8, Monitoring*

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEV-A27, PEV-A28, PEV-A29, PEV-A30, PEF-A14 and PEF-E3) while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason Not Incorporated: Since the allowable particulate emissions for the spray booth stacks (PEV-A27, PEV-A28, PEV-A29, PEV-A30, PEF-A14 and PEF-E3) are each less than 10 lbs/hr, the compliance monitoring is not required. Therefore, the above requirement is not included in the permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 12, 2005.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, i.e. pages 1 through 9)

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on April 12, 2001. 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 the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/facility | Potential to Emit (tons/year) | | | | | | |
|--|----------------------------------|-------|-----------------|--------------------|-------|-----------------|----------------------|
| | PM | PM-10 | SO ₂ | VOC ⁽⁵⁾ | CO | NO _x | HAP/ HAPs |
| Spray coating lines ^{(1),(2)} | 40.87 | 40.87 | 0.0 | 148.0 | 0.0 | 0.0 | 59.17 ⁽²⁾ |
| Extruding and curing ⁽³⁾ | 34.92 | 34.92 | 0.0 | 96.47 | 0.0 | 0.0 | 97.1 |
| Mixing and milling | 1.69 | 1.69 | 0.0 | 1.90 | 0.0 | 0.0 | 0.26 |
| Combustion devices ⁽⁴⁾ | 0.33 | 1.33 | 0.1 | 1.12 | 14.69 | 17.49 | 0.33 |
| Insignificant Activities | Neg. | Neg. | 0.0 | 2.0 | 0.0 | 0.0 | Neg. |
| Total Emissions | 76.12 | 77.11 | 0.1 | >100 <250 | 14.69 | 17.49 | 161.03 |

Notes:

- (1) Includes one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), four (4) waterborne urethane coating booths (Lines 4 and 7, Small Robot #1 and Small Robot #2), one (1) surface coating line (X003), two (2) spray lines (X034 and X036), one (1) spray line (X037), and two (2) spray lines (X039 and X040).
 - (2) In order to render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable, the VOC delivered to one (1) spray coating line (X025) is limited to less than 25 tons per 12 consecutive months. In order to render the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable, the individual HAP and combined HAPs delivered to one (1) spray coating line (X025) is limited to less than 10 and 25 tons per 12 consecutive months, respectively.
 - (3) Includes CV extrusion lines (X005 through X016, X033, X035 and X038), hot air curing lines (X005 through X011, X014 through X016, X035 and X038) and autoclave curing lines (X012 and X013).
 - (4) Includes seven (7) deodorizing furnaces (1.59 MMBtu/hr each), two (2) vulcanizing ovens (1.59 MMBtu/hr each), six (6) curing ovens (0.143 MMBtu/hr each), four (4) hot air rubber curing ovens (0.85 MMBtu/hr each), four (4) wire metal system burners (0.375 MMBtu/hr each), two (2) deodorizing furnaces (1.99 MMBtu/hr each), two (2) core metal heaters (1.19 MMBtu/hr each), one (1) drying oven (2 MMBtu/hr), one (1) curing oven (1.0 MMBtu/hr), one (1) preheat oven (1.5 MMBtu/hr), one (1) curing oven (2.0 MMBtu/hr), one (1) make-up air heater (1.5 MMBtu/hr), five (5) coating cure ovens (0.34 MMBtu/hr each), two (2) coating cure ovens (0.25 MMBtu/hr each) and four (4) hot air rubber curing ovens (0.4 MMBtu/hr each). All combustion devices fire natural gas.
 - (5) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the VOC delivered to spray coating lines, extruding and curing, mixing and milling, combustion devices and insignificant devices is limited to less than 148 tons per year, 96.47 tons per year, 1.90 tons per year, 1.12 tons per year and 2.0 tons per year, respectively.
- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or 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 equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 3.0 |
| PM-10 | 3.0 |
| SO ₂ | 0.0 |
| VOC | 33.0 |
| CO | 1.0 |
| NO _x | 3.0 |
| HAP (specify) | Not reported |

County Attainment Status

The source is located in LaGrange County.

| Pollutant | Status |
|-----------------|------------|
| PM2.5 | attainment |
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| 1-hour Ozone | attainment |
| 8-hour Ozone | attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) LaGrange County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC and HAPs:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and HAPs,
 - (2) that is subject to an emission limitation or standard for VOC and HAPs, and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) Pursuant to 40 CFR 60.451, large appliance surface coating line means that a portion of a large appliance assembly plant is engaged in the application and curing of organic surface coatings on large appliance parts or products. Large appliance part means any organic surface-coated metal lid, door, casing, panel, or other interior or exterior metal part or accessory that is assembled to form any large appliance product like organic surface-coated metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwasher, water heater, or trash compactor manufactured for household, commercial, or recreational use. The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.450), Subpart SS, *Standards of Performance for Industrial Surface Coating: Large Appliances* apply to each surface coating operation in a large appliance surface coating line that commenced construction, modification, or reconstruction after December 24, 1980. The source does not have any large appliance surface coating line and hence the requirements of 40 CFR 60.450, Subpart SS are not included in the permit.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.720, Subpart TTT), *Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines*, are not included in the permit for the surface coating operations because the Permittee does not apply prime coats, color coats, texture coats, or touch-up coats to plastic parts for use in the manufacture of business machines.
- (d) The requirements of New Source Performance Standard, (40 CFR 60.740, Subpart VVV) *Standards of Performance for Polymeric Coating of Supporting Substrates* are not included in the permit since the source does not have on-site any coating operation and coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20 (40 CFR Part 63.4480, Subpart PPPP) are not included in the permit because this source applies surface coating to extruded rubber pieces and does not apply surface coating to plastic parts and products as defined in 40 CFR 63.4581.
- (f) The requirements of 40 CFR 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters*, are not included in the permit for the process heaters at the source. These units are considered as existing small gaseous fuel units, as defined by 40 CFR 63.7575 (i.e., each unit's heat input rating is less than or equal to 10 million Btu per hour). As such, pursuant to 40 CFR 63.7506(c), there are no 40 CFR 63, Subpart DDDDD or 40 CFR 63, Subpart A requirements included in the permit for the small gaseous fuel subcategory.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on November 15, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, which is not one of the 28 listed source categories, is an existing minor stationary source because the potential to emit VOC from the source has always been restricted to less than 250 tons per year. All surface coating lines and extrusion lines constructed after August 7, 1980 have potential to emit of each attainment criteria pollutant less than major source thresholds. Therefore, the PSD requirements will continue to not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

In order to render the requirements of 326 IAC 2-4.1 not applicable, each individual hazardous air pollutant (HAP) and any combination of HAPs delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, minus the amount of that HAP recovered, shall be limited to less than ten (10) tons and twenty-five (25) tons per consecutive twelve (12) month period, respectively, with compliance determined at the end of each month.

SDM EB silicone application line, identified as emission unit X019, has Xylene emissions greater than ten (10) tons per year. However, this line was constructed before the July 27, 1997 applicability date.

The potential to emit individual HAP and combination of HAPs from the following extrusion lines, which are constructed or reconstructed after July 27, 1997, is less than 10 tons per year and 25 tons per year, respectively:

1. SDM EA Extrusion Line, identified as X014;
2. SDM ED Extrusion Line, identified as X033;
3. SDM EE Extrusion Line, identified as X035; and
4. CV Line 10 Extrusion Line, identified as X038.

No other process or production unit, which is constructed or reconstructed after July 27, 1997, has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 4-2-1 (Incinerators)

The requirements of 326 IAC 4-2-1 apply to all incinerators which emit regulated pollutants. Pursuant to 326 IAC 1-2-34, an incinerator is defined as an engineered apparatus that burns waste substances with controls on combustion factors including, but not limited to, temperature, retention time, and air. No combustion device at the source burns waste substances with controls on combustion factors. Therefore, 326 IAC 4-2-1 does not apply.

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

Pursuant to 326 IAC 6-3-2 (d)(1), particulate from the surface coating operations at the following surface coating lines shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications:

- (a) One (1) spray coating line (X025);
- (b) One (1) Line 2 spray booth (X029);
- (c) One (1) Line 3 spray booth (X030);
- (d) One (1) Line 5 spray booth (X031);
- (e) One (1) Line 6 spray booth (X032);
- (f) Two (2) CV finishing touchup stations (X004);
- (g) One (1) SDM EB silicone application line (X019);
- (h) One (1) urethane application line (CV Line 9, X020);
- (i) One (1) SDM EC urethane application line (X021);
- (j) One (1) urethane application line (X023);

- (k) One (1) Line 4 waterborne urethane coating booth (X026);
- (l) One (1) Line 7 waterborne urethane coating booth (X027)
- (m) One (1) waterborne urethane coating booth (Small Robot #1);
- (n) One (1) spray line (X034);
- (o) One (1) surface coating line (X003);
- (p) One (1) spray line (X036);
- (q) One (1) spray line (X037);
- (r) One (1) spray line (X039); and
- (s) One (1) spray line (X040).

Pursuant to 326 IAC 6-3-2 (d)(3), sources that operate pursuant to a valid Title V permit are exempt from 326 IAC 6-3-2 (d)(2). Therefore, the 326 IAC 6-3-2 (d)(2) provisions are not included in this operating permit renewal.

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

The particulate from the facilities at this source shall be limited as specified in the following table:

| Emission Unit | Process Weight Rate (tons per hour) | Allowable PM Emission Rate (pounds per hour) | Potential PM Emission Rate After Controls (if applicable) (pounds per hour) |
|--------------------------|--|---|--|
| CV Extrusion Line (X005) | 0.101 | 0.882 | 2.24E-05 |
| CV Extrusion Line (X006) | 0.101 | 0.882 | 2.24E-05 |
| CV Extrusion Line (X007) | 0.101 | 0.882 | 2.24E-05 |
| CV Extrusion Line (X008) | 0.101 | 0.882 | 2.24E-05 |
| CV Extrusion Line (X009) | 0.201 | 1.40 | 4.48E-05 |
| CV Extrusion Line (X010) | 0.201 | 1.40 | 4.48E-05 |
| CV Extrusion Line (X011) | 0.301 | 1.83 | 6.72E-05 |
| CV Extrusion Line (X012) | 0.201 | 1.40 | 4.48E-05 |
| CV Extrusion Line (X013) | 0.201 | 1.40 | 4.48E-05 |
| CV Extrusion Line (X014) | 0.65 | 3.05 | 1.44E-04 |
| CV Extrusion Line (X015) | 0.60 | 2.91 | 1.34E-04 |
| CV Extrusion Line (X016) | 0.60 | 2.91 | 1.34E-04 |
| CV Extrusion Line (X033) | 0.65 | 3.05 | 4.73E-05 |
| CV Extrusion Line (X035) | 0.65 | 3.05 | 4.73E-05 |
| CV Extrusion Line (X038) | 0.375 | 2.91 | 1.34E-04 |

| Emission Unit | Process Weight Rate (tons per hour) | Allowable PM Emission Rate (pounds per hour) | Potential PM Emission Rate After Controls (if applicable) (pounds per hour) |
|--------------------------|--|---|--|
| Mixing department (X017) | 0.28 | 1.76 | 0.008 |
| Mixing department (X018) | 0.25 | 1.63 | 0.008 |

The allowable particulate matter (PM) emission rates from the above facilities were calculated 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:

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

All particulate control equipment shall be in operation at all times when the operations are performed to comply with this limit.

The particulate emissions from the following insignificant activities are also restricted by the above formula:

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F, each with a dispersion system, using particulate filters as control [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) Silicone Coating Mixing Station [326 IAC 6-3]
- (m) Die Room Metalworking Equipment [326 IAC 6-3]
- (n) SDM Mezzanine Units [326 IAC 6-3]
- (o) Barwell Warm-Up Mill [326 IAC 6-3]

The potential to emit before controls from all insignificant activities is below the significant unit emission thresholds.

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

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compounds (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X 025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. The source has taken this limit in order to render the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

The total VOC usage at the sourcewide surface coating operations is limited to no more than 148 tons per consecutive twelve (12) month period with compliance determined at the end of each month. Pursuant to Part 70 No. 087-7182-00031, issued on April 12, 2001 and Part 70 SPM No. 087-19170-00031, issued on September 9, 2004, this sourcewide surface coating VOC usage limit with the following conditions is determined to be the best available control technology (BACT) for the silicone application line (X019):

- (1) All coating, urethane and silicone application devices at these facilities or shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (2) All VOC containing containers shall be kept covered when not in use.

The potential to emit VOC from all of the following extrusion lines, which are constructed or reconstructed on or after January 1, 1980, is less than 25 tons per year:

1. CV Line 1 Extrusion Line, identified as X005;
2. CV Line 2 Extrusion Line, identified as X006;
3. CV Line 3 Extrusion Line, identified as X007;
4. CV Line 4 Extrusion Line, identified as X008;
5. CV Line 5 Extrusion Line, identified as X009;
6. CV Line 6 Extrusion Line, identified as X010;
7. CV Line 7 Extrusion Line, identified as X011;
8. CV Line 8 Extrusion Line, identified as X012;
9. CV Line 9 Extrusion Line, identified as X013;
10. SDM EA Extrusion Line, identified as X014;
11. SDM EB Extrusion Line, identified as X015;
12. SDM EC Extrusion Line, identified as X016;
13. SDM ED Extrusion Line, identified as X033;
14. SDM EE Extrusion Line, identified as X035; and
15. CV Line 10 Extrusion Line, identified as X038.

No other process or production unit, which is constructed on or after January 1, 1980, has potential volatile organic compounds (VOC) emissions of 25 tons per year or more. Therefore, 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

326 IAC 8-2-1 (Surface Coating Emission Limitations)

This source does not perform any operations of the types described in 326 IAC 8-2-2 through 8-2-13. Therefore, 326 IAC 8-2 does not apply.

Testing Requirements

IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard. The Permittee has demonstrated compliance through emission rate calculations with emission limits applicable to the facilities at this source. Therefore no emissions testing is required in this Part 70 permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no monitoring conditions specifically applicable to any facility at this source.

Conclusion

The operation of this extruded rubber seals manufacturing source shall be subject to the conditions of this Part 70 permit 087-21424-00031.

Appendix A: Emission Calculations

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Plt ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

| Uncontrolled Potential Emissions (tons/year) | | | | |
|---|-----------------|---------------|--|----------------|
| Emissions Generating Activity | | | | |
| Pollutant | Surface Coating | Combustion | Rubber Parts Manufacturing (including extrusion lines) | TOTAL |
| PM | 40.87 | 0.34 | 19.21 | 60.42 |
| PM10 | 40.87 | 1.34 | 19.21 | 61.42 |
| SO2 | 0.00 | 0.11 | 0.00 | 0.11 |
| NOx | 0.00 | 17.66 | 0.00 | 17.66 |
| VOC | 226.43 | 0.97 | 108.04 | 335.45 |
| CO | 0.00 | 14.83 | 0.00 | 14.83 |
| total HAPs | 59.17 | 0.33 | 97.89 | 157.39 |
| worst case single HAP | 24.67 (Xylene) | 0.32 (Hexane) | 27.85 (Hexane) | 28.17 (Hexane) |
| Total emissions based on rated capacity at 8,760 hours/year. | | | | |
| Controlled Potential Emissions (tons/year) | | | | |
| Emissions Generating Activity | | | | |
| Pollutant | Surface Coating | Combustion | Rubber Parts Manufacturing (including extrusion lines) | TOTAL |
| PM | 2.04 | 0.34 | 2.38 | 4.76 |
| PM10 | 2.04 | 1.34 | 2.38 | 5.77 |
| SO2 | 0.00 | 0.11 | 0.00 | 0.11 |
| NOx | 0.00 | 17.66 | 0.00 | 17.66 |
| VOC | 148.00 | 0.97 | 98.37 | 247.34 |
| CO | 0.00 | 14.83 | 0.00 | 14.83 |
| total HAPs | 59.17 | 0.33 | 97.89 | 157.39 |
| worst case single HAP | 24.67 (Xylene) | 0.32 (Hexane) | 27.85 (Hexane) | 28.17 (Hexane) |
| Total emissions based on rated capacity at 8,760 hours/year, after control. | | | | |
| VOC emissions from extruding and curing and mixing and milling operations are limited to less than 96.47 TPY and 1.9 TPY, respectively. | | | | |

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Pit ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

| | |
|--|---------------------------------|
| Heat Input Capacity ⁽¹⁾ MMBtu/hr | Potential Throughput MMCF/yr |
| 40.32 | 353.20 |

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-------|-------------|-------|-------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.336 | 1.342 | 0.106 | 17.66 | 0.971 | 14.83 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Note:

- (1) Combined heat input capacity for the following combustion devices:
- X005: One (1) deodorizing furnace (1.59 MMBtu/hr) and One (1) pre-heater (0.298 MMBtu/hr)
 - X006: One (1) deodorizing furnace (1.59 MMBtu/hr) and One (1) pre-heater (0.298 MMBtu/hr)
 - X007: One (1) deodorizing furnace (1.59 MMBtu/hr)
 - X008: One (1) deodorizing furnace (1.59 MMBtu/hr)
 - X009: One (1) deodorizing furnace (1.59 MMBtu/hr)
 - X010: One (1) deodorizing furnace (1.59 MMBtu/hr)
 - X011: One (1) deodorizing furnace (1.59 MMBtu/hr)
 - X012: One (1) vulcanizing oven (1.59 MMBtu/hr)
 - X013: One (1) vulcanizing oven (1.59 MMBtu/hr)
 - X014: Two (2) curing ovens (0.143 MMBtu/hr each), two (2) hot air rubber curing ovens (0.85 MMBtu/hr each) and two (2) wire metal system burners (0.375 MMBtu/hr each)
 - X015: One (1) deodorizing furnace (1.99 MMBtu/hr) and one (1) core metal heater (1.19 MMBtu/hr)
 - X016: One (1) deodorizing furnace (1.99 MMBtu/hr) and one (1) core metal heater (1.19 MMBtu/hr)
 - X019: One (1) drying oven (2 MMBtu/hr)
 - X021: One (1) curing oven (1.0 MMBtu/hr)
 - X025: One (1) preheat oven (1.5 MMBtu/hr), one (1) curing oven (2.0 MMBtu/hr) and make-up air heater (1.5 MMBtu/hr)
 - X033: Two (2) curing ovens (0.143 MMBtu/hr) and two (2) wire metal system burners (0.375 MMBtu/hr each)
 - X034: One (1) coating cure oven (0.34 MMBtu/hr)
 - X035: Two (2) hot air rubber curing ovens (0.85 MMBtu/hr each) and two (2) curing ovens (0.143 MMBtu/hr each)
 - X036: Two (2) coating cure ovens (0.34 MMBtu/hr each)
 - X037: Two (2) coating cure ovens (0.34 MMBtu/hr each)
 - X038: Two (2) coating cure ovens (0.25 MMBtu/hr each) and two (2) hot air rubber curing ovens (0.4 MMBtu/hr each)

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) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Pit ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

HAPs - Organics

| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
|-------------------------------|----------|-----------------|--------------|----------|----------|
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 3.71E-04 | 2.12E-04 | 1.32E-02 | 3.18E-01 | 6.00E-04 |

HAPs - Metals

| | Lead | Cadmium | Chromium | Manganese | Nickel |
|-------------------------------|----------|----------|----------|-----------|----------|
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 8.83E-05 | 1.94E-04 | 2.47E-04 | 6.71E-05 | 3.71E-04 |

Methodology is the same as page 2.

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

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

Company Name: Nishikawa Standard Company
 Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
 Part 70 Renewal No.: T087-21424-00031
 Pit ID: 087-00031
 Reviewer: GS/EVP
 Date: 4/17/2006

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency* |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|----------------------|
| Small Robot #2 (X003) | | | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 88.00% | 0.0% | 88.0% | 0.0% | 12.00% | 0.15000 | 1.000 | 5.79 | 5.79 | 0.87 | 20.85 | 3.80 | 0.00 | 48.25 | 75% |
| CV Finishing Touchup Stations (X004) | | | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 88.00% | 0.0% | 88.0% | 0.0% | 12.00% | 0.60800 | 1.000 | 5.79 | 5.79 | 3.52 | 84.49 | 15.42 | 0.00 | 48.25 | 100% |
| Silicone application line SDM-EB (X019) | | | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 88.00% | 0.0% | 88.0% | 0.0% | 12.00% | 0.00086 | 4080.000 | 5.79 | 5.79 | 20.32 | 487.62 | 88.99 | 0.00 | 48.25 | 100% |
| | | | | | | | lbs/hr | | | | | | | | | |
| FKJF Recipe | 6.58 | 88.00% | 0.0% | 88.0% | 0.0% | 12.00% | 6.61000 | 1.000 | 5.79 | 5.79 | 5.82 | 139.60 | 25.48 | 0.10 | 48.25 | 75% |
| Urethane Application Line-CV Line 9 (X020) | | | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 80.00% | 43.0% | 37.0% | 43.0% | 19.00% | 6.61000 | 1.000 | 5.52 | 3.15 | 2.45 | 58.70 | 10.71 | 0.91 | 16.57 | 75% |
| Urethane Application Line-SDM EC (X021) | | | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 80.00% | 43.0% | 37.0% | 43.0% | 19.00% | 3.30500 | 1.000 | 5.52 | 3.15 | 1.22 | 29.35 | 5.36 | 0.46 | 16.57 | 75% |
| Urethane Application Line-CV Line 8 (X023) | | | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 80.00% | 43.0% | 37.0% | 43.0% | 19.00% | 6.61000 | 1.000 | 5.52 | 3.15 | 2.45 | 58.70 | 10.71 | 0.91 | 16.57 | 75% |
| Spray Booth-Line 2 (X029) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 3.97000 | 1.000 | 1.85 | 0.89 | 0.41 | 9.91 | 1.81 | 1.55 | 2.55 | 75% |
| Spray Booth-Line 3 (X030) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 3.97000 | 1.000 | 1.85 | 0.89 | 0.41 | 9.91 | 1.81 | 1.55 | 2.55 | 75% |
| Spray Booth-Line 5 (X031) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 7.93000 | 1.000 | 1.85 | 0.89 | 0.82 | 19.79 | 3.61 | 3.10 | 2.55 | 75% |
| Spray Booth-Line 6 (X032) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 7.93000 | 1.000 | 1.85 | 0.89 | 0.82 | 19.79 | 3.61 | 3.10 | 2.55 | 75% |
| Waterborne Urethane Coating Booth-Line 4 (X026) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 3.97000 | 1.000 | 1.85 | 0.89 | 0.41 | 9.91 | 1.81 | 1.55 | 2.55 | 75% |
| Waterborne Urethane Coating Booth-Line 7 (X027) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 11.90000 | 1.000 | 1.85 | 0.89 | 1.24 | 29.70 | 5.42 | 4.65 | 2.55 | 75% |
| Small Robot#1 (X028) | | | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 60.20% | 49.8% | 10.4% | 52.2% | 34.70% | 1.32000 | 1.000 | 1.85 | 0.89 | 0.14 | 3.29 | 0.60 | 0.52 | 2.55 | 75% |

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

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Pit ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency* |
|---|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|----------------------|
| Spray Coating Line (X025) | | | | | | | | | | | | | | | | |
| H792C | 7.20 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00120 | 195.000 | 7.20 | 7.20 | 1.68 | 40.3 | 7.36 | 0.00 | n/a | 75% |
| UNISTOLE P 401 | 7.34 | 95.00% | 0.0% | 95.0% | 0.0% | 0.00% | 0.00071 | 195.000 | 6.97 | 6.97 | 0.97 | 23.3 | 4.25 | 0.06 | n/a | 75% |
| Oflex Hardener EH-47 | 8.59 | 54.50% | 0.0% | 54.5% | 0.0% | 1.00% | 0.00019 | 195.000 | 4.68 | 4.68 | 0.17 | 4.1 | 0.76 | 0.16 | 468 | 75% |
| FUM Primer Blend | 7.37 | 93.53% | 0.00% | 93.5% | 0.0% | 0.09% | 0.00210 | 195.000 | 6.89 | 6.89 | 2.82 | 67.7 | 12.4 | 0.21 | 7659 | 75% |
| ST 97 PA | 7.51 | 50.00% | 0.0% | 50.0% | 0.0% | 50.00% | 0.00009 | 195.000 | 3.75 | 3.75 | 0.06 | 1.5 | 0.28 | 0.07 | 7.51 | 75% |
| H792C | 7.20 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.00141 | 195.000 | 7.20 | 7.20 | 1.98 | 47.4 | 8.65 | 0.00 | n/a | 75% |
| Oflex Hardener EH-47 | 8.59 | 54.50% | 0.0% | 54.5% | 0.0% | 1.00% | 0.00026 | 195.000 | 4.68 | 4.68 | 0.24 | 5.8 | 1.06 | 0.22 | 468 | 75% |
| Oflex No. 100 H-5 | 8.01 | 74.00% | 0.0% | 74.0% | 0.0% | 25.00% | 0.00264 | 195.000 | 5.93 | 5.93 | 3.05 | 73.2 | 13.37 | 1.17 | 23.7 | 75% |
| FUM Coating Blend | 7.77 | 79.94% | 0.00% | 79.9% | 0.0% | 16.1% | 0.00440 | 195.000 | 6.21 | 6.21 | 5.33 | 128.0 | 23.4 | 1.46 | 39 | 75% |
| CV Line 10 Spray Coating Line (X039) | | | | | | | | grams/min/gun | | | | | | | | |
| F-KWD | 8.35 | 70.83% | 69.8% | 1.0% | 0.0% | 0.00% | 10.00000 | 4.000 | 0.09 | 0.09 | 0.05 | 1.3 | 0.24 | 2.36 | n/a | 65% |
| Spray Coating Line (X040) | | | | | | | | grams/min/gun | | | | | | | | |
| F-KWD | 8.35 | 70.83% | 69.8% | 1.0% | 0.0% | 0.00% | 10.00000 | 2.000 | 0.09 | 0.09 | 0.03 | 0.7 | 0.12 | 1.18 | n/a | 65% |
| Cleaning Agent | | | | | | | | grams/min/gun | | | | | | | | |
| Mean Green | 8.51 | 4.10% | 0.0% | 4.1% | 0.0% | 0.00% | 10.00000 | 6.000 | 0.35 | 0.35 | 0.33 | 7.8 | 1.42 | 11.66 | n/a | 65% |
| SDM EE Spray Line (X-036) | | | | | | | | pounds/hr/gun | | | | | | | | |
| TW-017B | 8.51 | 78.50% | 69.1% | 9.4% | 71.0% | 19.80% | 1.32000 | 6.000 | 2.76 | 0.80 | 0.74 | 17.87 | 3.26 | 1.86 | 4.04 | 75% |
| Spray Line (X-034) | | | | | | | | pounds/hr/gun | | | | | | | | |
| TW-017B | 8.51 | 78.50% | 69.1% | 9.4% | 71.0% | 19.80% | 1.32000 | 6.000 | 2.76 | 0.80 | 0.74 | 17.87 | 3.26 | 1.86 | 4.04 | 75% |
| SDM EA Spray Line (X-037) | | | | | | | | grams/min/gun | | | | | | | | |
| TW-017B | 8.51 | 78.50% | 69.1% | 9.4% | 71.0% | 19.80% | 10.00000 | 6.000 | 2.76 | 0.80 | 0.75 | 17.89 | 3.26 | 1.87 | 4.04 | 75% |
| 51.70 | | | | | | | | | | | | 1240.72 | 226.43 | 40.87 | | |

Limited Potential Emissions

| Total Limited Potential Emissions: | Control Efficiency: | | Limited VOC lbs per Hour | Limited VOC lbs per Day | Limited VOC tons per Year | Controlled PM tons/yr |
|------------------------------------|---------------------|--------|--------------------------|-------------------------|---------------------------|-----------------------|
| | VOC | PM | | | | |
| | 0.00% | 95.00% | | | | |

| Total Limited Potential Emissions: | | Total Controlled Potential Emissions: | |
|------------------------------------|--------|---------------------------------------|---------|
| Total Emissions | VOC | Total Emissions | PM/PM10 |
| Unlimited (tons/yr) | 226.43 | Uncontrolled (tons/yr) | 40.87 |
| Limited (tons/yr) | 148.00 | Controlled (tons/yr) | 2.04 |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Potential VOC Pounds per Hour = Throughput (grams/min/gun) * Number of Guns * Weight % Organics * 60 min/hr * 1 lb/454 grams
 Potential VOC Pounds per Hour for cleaning agent = Throughput (grams/min/gun) * Number of Guns * Weight % Organics * 3 min/hr * 1 lb/454 grams (cleaning agent will not be used more than 3 minutes per hour)
 Particulate Potential Tons per Year = (grams/min/gun) * Number of guns * 60 min/hr * 1 lb/454 grams * (1-Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

* Transfer Efficiency for HVLP and flat coated surface is 65-75%.
 Transfer Efficiency for drip applicators and finishing touchup operations is 100%.

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Plt ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Emission Factor | Weight % Glycol Ethers | Weight % Toluene | Weight % MIBK | Weight % Ethylene Glycol | Weight % Xylene | Glycol Ethers Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Ethylene Glycol Emissions (ton/yr) | Xylene Emissions (ton/yr) |
|---|------------------|--------------------------------|---------------------|-----------------|------------------------|------------------|---------------|--------------------------|-----------------|----------------------------------|----------------------------|-------------------------|------------------------------------|---------------------------|
| Small Robot #2 (X003) | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 0.15000 | 1.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 13.15% | 0.00 | 0.00 | 0.00 | 0.00 | 0.57 |
| CV Finishing Touchup Stations (X004) | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 0.60800 | 1.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 13.15% | 0.00 | 0.00 | 0.00 | 0.00 | 2.30 |
| Silicone application line SDM-EB (X019) | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 0.00086 | 4080.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 13.15% | 0.00 | 0.00 | 0.00 | 0.00 | 13.30 |
| lbs/hr | | | | | | | | | | | | | | |
| FKJF Recipe | 6.58 | 6.61000 | 1.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 13.15% | 0.00 | 0.00 | 0.00 | 0.00 | 3.81 |
| Urethane Application Line-CV Line 9 (X020) | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 6.61000 | 1.00 | N/A | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.58 | 0.00 | 0.00 | 0.00 | 0.00 |
| Urethane Application Line-SDM EC (X021) | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 3.30500 | 1.00 | N/A | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 |
| Urethane Application Line-CV Line 8 (X023) | | | | | | | | | | | | | | |
| BB 35062 | 8.51 | 6.61000 | 1.00 | N/A | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.58 | 0.00 | 0.00 | 0.00 | 0.00 |
| Spray Booth-Line 2 (X029) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 3.97000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 0.80 | 0.00 | 0.00 | 0.00 | 0.07 |
| Spray Booth-Line 3 (X030) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 3.97000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 0.80 | 0.00 | 0.00 | 0.00 | 0.07 |
| Spray Booth-Line 5 (X031) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 7.93000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 1.60 | 0.00 | 0.00 | 0.00 | 0.14 |
| Spray Booth-Line 6 (X032) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 7.93000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 1.60 | 0.00 | 0.00 | 0.00 | 0.14 |
| Waterborne Urethane Coating Booth-Line 4 (X026) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 3.97000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 0.80 | 0.00 | 0.00 | 0.00 | 0.07 |
| Waterborne Urethane Coating Booth-Line 7 (X027) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 11.90000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 2.40 | 0.00 | 0.00 | 0.00 | 0.21 |
| Waterborne Urethane Coating Booth-Small Robot#1 (X028) | | | | | | | | | | | | | | |
| SP-217 | 8.51 | 1.32000 | 1.00 | N/A | 4.60% | 0.00% | 0.00% | 0.00% | 0.40% | 0.27 | 0.00 | 0.00 | 0.00 | 0.02 |

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Plt ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006**

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Emission Factor | Weight % Glycol Ethers | Weight % Toluene | Weight % MIBK | Weight % Ethylene Glycol | Weight % Xylene | Glycol Ethers Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Ethylene Glycol Emissions (ton/yr) | Xylene Emissions (ton/yr) |
|----------------------------------|------------------|--------------------------------|---------------------|-----------------|------------------------|------------------|---------------|--------------------------|-----------------|----------------------------------|----------------------------|-------------------------|------------------------------------|---------------------------|
| Spray Coating Line (X025) | | | | | | | | | | | | | | |
| H792C | 7.20 | 1.20E-03 | 195.00 | N/A | 0.00% | 90.00% | 9.00% | 0.00% | 0.00% | 0.00 | 6.64 | 0.66 | 0.00 | 0.00 |
| UNISTOLE P 401 | 7.34 | 7.10E-04 | 195.00 | N/A | 0.00% | 95.00% | 0.00% | 0.00% | 0.00% | 0.00 | 4.23 | 0.00 | 0.00 | 0.00 |
| Oflex Hardener EH-47 | 8.59 | 1.90E-04 | 195.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ST 97 PA | 7.51 | 0.00009 | 195.00 | N/A | 0.00% | 50.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.29 | 0.00 | 0.00 | 0.00 |
| H792C | 7.2 | 0.00141 | 195.00 | N/A | 0.00% | 90.00% | 9.00% | 0.00% | 0.00% | 0.00 | 7.80 | 0.78 | 0.00 | 0.00 |
| Oflex Hardener EH-47 | 8.59 | 0.00026 | 195.00 | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Oflex No. 100 H-5 | 8.01 | 0.00264 | 195.00 | N/A | 0.00% | 0.00% | 22.00% | 0.00% | 22.00% | 0.00 | 0.00 | 3.97 | 0.00 | 3.97 |
| SDM EE Spray Line (X036) | | | | | | | | | | | | | | |
| | | lbs/hr/gun | no. of guns | | | | | | | | | | | |
| TW-017B | 8.56 | 1.32000 | 6.00 | N/A | 0.00% | 0.00% | 0.00% | 0.60% | 0.00% | 0.00 | 0.00 | 0.00 | 0.21 | 0.00 |
| SDM EA Spray Line (X037) | | | | | | | | | | | | | | |
| | | grams/min/gun | no. of guns | | | | | | | | | | | |
| TW-017B | 8.56 | 10.00000 | 6.00 | N/A | 0.00% | 0.00% | 0.00% | 0.60% | 0.00% | 0.00 | 0.00 | 0.00 | 0.21 | 0.00 |

Total Potential Emissions **9.71 18.96 5.42 0.42 24.67**

Total HAPs (tons per year) 59.17

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material usage limitation.

**Appendix A: Emission Calculations
Extrusion Lines**

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Pft ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

| Emission Unit | Potential Talc Throughput (lbs/hr) | Talc Transfer Efficiency | Control Efficiency | Uncontrolled | | Controlled | |
|--------------------------|------------------------------------|--------------------------|--------------------|--------------------------------------|---------------------------------------|--------------------------------------|---------------------------------------|
| | | | | Potential PM/PM10 Emissions (lbs/hr) | Potential PM/PM10 Emissions (tons/yr) | Potential PM/PM10 Emissions (lbs/hr) | Potential PM/PM10 Emissions (tons/yr) |
| CV Line 1 Duster (X005) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 2 Duster (X006) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 3 Duster (X007) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 4 Duster (X008) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 5 Dusters (X009) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 6 Dusters (X010) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| CV Line 7 Duster (X011) | 2 | 75% | 0% | 0.50 | 2.2 | 0.50 | 2.19 |
| CV Line 8 Duster (X013) | 2 | 75% | 99% | 0.50 | 2.2 | 0.01 | 0.02 |
| Total | | | | 4.00 | 17.52 | 0.54 | 2.34 |

Note:
Talc is applied to extruded rubber in the dusters by dragging the hot, tacky rubber through a trough of talc. The talc adheres to the rubber and there are minimal emissions generated during the transfer of the talc to the rubber.
CV Line 9 uses sodium bicarbonate instead of talc but emission calculations are the same.

Potential Uncontrolled Emissions (lbs/hr) = Talc Throughput (lbs/hr) x (1 - Transfer Efficiency)
Potential Uncontrolled Emissions (tons/yr) = Potential Uncontrolled Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs
Potential Controlled Emissions (lbs/hr) = Talc Throughput (lbs/hr) x (1 - Transfer Efficiency) x (1 - Control Efficiency)
Potential Controlled Emissions (tons/yr) = Potential Controlled Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

| Emission Unit | Dust Collector Unit ID | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 allowable emission rate (lb/hr) | In Compliance? | Control Device Required to Comply? |
|--------------------------|------------------------|-------------------------------|---|----------------|------------------------------------|
| | | | | | |
| CV extrusion line (X006) | DC-1 | 0.101 | 0.88 | Yes | No |
| CV extrusion line (X007) | DC-1 | 0.101 | 0.88 | Yes | No |
| CV extrusion line (X008) | DC-1 | 0.101 | 0.88 | Yes | No |
| CV extrusion line (X009) | DC-2 | 0.201 | 1.40 | Yes | No |
| CV extrusion line (X010) | DC-2 | 0.201 | 1.40 | Yes | No |
| CV extrusion line (X011) | N/A | 0.301 | 1.83 | Yes | No |
| CV extrusion line (X012) | N/A | 0.201 | 1.40 | Yes | No |
| CV extrusion line (X013) | DC-3 | 0.201 | 1.40 | Yes | No |
| CV extrusion line (X014) | N/A | 0.6445 | 3.05 | Yes | No |
| CV extrusion line (X015) | N/A | 0.6 | 2.91 | Yes | No |
| CV extrusion line (X016) | N/A | 0.6 | 2.91 | Yes | No |

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c), Process Operations, for weight rates up to 60,000 lb/hr is determined using the following formula:

$$E = 4.1 \cdot P^{0.67}$$
 where: E = allowable PM emission rate (lb/hr)
 P = process weight rate (tons/hr)

Other Emissions from Rubber Parts Manufacturing

| | Rubber Throughput (lbs/hr) | VOC Emission Factor (lbs/lb rubber) | VOC (lbs/hr) | VOC (tons/yr) | Total HAPs Emission Factor (lbs/lb rubber) | HAPs (lbs/hr) | HAPs (tons/yr) | PM/PM10 Emission Factor (lbs/lb rubber) | PM/PM10 (lbs/hr) | PM/PM10 (tons/yr) | PM/PM10 Control Efficiency | PM/PM10 after controls (lbs/hr) | PM/PM10 after controls (tons/yr) |
|---------------------------|----------------------------|-------------------------------------|--------------|---------------|--|---------------|----------------|---|------------------|-------------------|----------------------------|---------------------------------|----------------------------------|
| Extruding (X005) | 200 | 5.00E-04 | 0.1 | 0.438 | 7.52E-05 | 0.015 | 0.066 | 1.12E-07 | 2.24E-05 | 9.81E-05 | 0.00% | 2.24E-05 | 9.81E-05 |
| Extruding (X006) | 200 | 5.00E-04 | 0.1 | 0.438 | 7.52E-05 | 0.015 | 0.066 | 1.12E-07 | 2.24E-05 | 9.81E-05 | 0.00% | 2.24E-05 | 9.81E-05 |
| Extruding (X007) | 200 | 5.00E-04 | 0.1 | 0.438 | 7.52E-05 | 0.015 | 0.066 | 1.12E-07 | 2.24E-05 | 9.81E-05 | 0.00% | 2.24E-05 | 9.81E-05 |
| Extruding (X008) | 200 | 5.00E-04 | 0.1 | 0.438 | 7.52E-05 | 0.015 | 0.066 | 1.12E-07 | 2.24E-05 | 9.81E-05 | 0.00% | 2.24E-05 | 9.81E-05 |
| Extruding (X009) | 400 | 5.00E-04 | 0.2 | 0.876 | 7.52E-05 | 0.030 | 0.132 | 1.12E-07 | 4.48E-05 | 1.96E-04 | 0.00% | 4.48E-05 | 1.96E-04 |
| Extruding (X010) | 400 | 5.00E-04 | 0.2 | 0.876 | 7.52E-05 | 0.030 | 0.132 | 1.12E-07 | 4.48E-05 | 1.96E-04 | 0.00% | 4.48E-05 | 1.96E-04 |
| Extruding (X011) | 600 | 5.00E-04 | 0.3 | 1.314 | 7.52E-05 | 0.045 | 0.198 | 1.12E-07 | 6.72E-05 | 2.94E-04 | 0.00% | 6.72E-05 | 2.94E-04 |
| Extruding (X012) | 400 | 5.00E-04 | 0.2 | 0.876 | 7.52E-05 | 0.030 | 0.132 | 1.12E-07 | 4.48E-05 | 1.96E-04 | 0.00% | 4.48E-05 | 1.96E-04 |
| Extruding (X013) | 400 | 5.00E-04 | 0.2 | 0.876 | 7.52E-05 | 0.030 | 0.132 | 1.12E-07 | 4.48E-05 | 1.96E-04 | 0.00% | 4.48E-05 | 1.96E-04 |
| Extruding (X014) | 1289 | 5.00E-04 | 0.645 | 2.823 | 7.52E-05 | 0.097 | 0.425 | 1.12E-07 | 1.44E-04 | 6.32E-04 | 0.00% | 1.44E-04 | 6.32E-04 |
| Extruding (X015) | 1200 | 5.00E-04 | 0.6 | 2.628 | 7.52E-05 | 0.090 | 0.395 | 1.12E-07 | 1.34E-04 | 5.89E-04 | 0.00% | 1.34E-04 | 5.89E-04 |
| Extruding (X016) | 1200 | 5.00E-04 | 0.6 | 2.628 | 7.52E-05 | 0.090 | 0.395 | 1.12E-07 | 1.34E-04 | 5.89E-04 | 0.00% | 1.34E-04 | 5.89E-04 |
| Extruding (X033) | 1289 | 5.00E-04 | 0.6445 | 2.823 | 3.99E-05 | 0.051 | 0.225 | 3.67E-08 | 4.73E-05 | 2.07E-04 | 0.00% | 4.73E-05 | 2.07E-04 |
| Extruding (X035) | 1289 | 5.00E-04 | 0.6445 | 2.823 | 3.99E-05 | 0.051 | 0.225 | 2.67E-08 | 4.73E-05 | 2.07E-04 | 0.00% | 4.73E-05 | 2.07E-04 |
| Extruding (X038) | 750 | 5.00E-04 | 0.3750 | 1.643 | 2.99E-05 | 0.022 | 0.098 | 2.67E-08 | 2.00E-05 | 8.77E-05 | 0.00% | 2.00E-05 | 8.77E-05 |
| Hot Air Curing (X005) | 200 | 2.49E-03 | 0.498 | 2.18 | 3.46E-03 | 0.692 | 3.03 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X006) | 200 | 2.49E-03 | 0.498 | 2.18 | 3.46E-03 | 0.692 | 3.03 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X007) | 200 | 2.49E-03 | 0.498 | 2.18 | 3.46E-03 | 0.692 | 3.03 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X008) | 200 | 2.49E-03 | 0.498 | 2.18 | 3.46E-03 | 0.692 | 3.03 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X009) | 400 | 2.49E-03 | 0.996 | 4.36 | 3.46E-03 | 1.38 | 6.06 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X010) | 400 | 2.49E-03 | 0.996 | 4.36 | 3.46E-03 | 1.38 | 6.06 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X011) | 600 | 2.49E-03 | 1.494 | 6.54 | 3.46E-03 | 2.08 | 9.09 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X038) | 1289 | 1.90E-03 | 2.449 | 10.73 | 8.76E-04 | 1.26 | 5.51 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X038) | 750 | 1.90E-03 | 1.425 | 6.24 | 8.76E-04 | 0.73 | 3.21 | N/A | N/A | N/A | N/A | N/A | N/A |
| Autoclave Curing (X012) | 400 | 6.15E-03 | 2.460 | 10.8 | 6.04E-03 | 2.42 | 10.6 | N/A | N/A | N/A | N/A | N/A | N/A |
| Autoclave Curing (X013) | 400 | 6.15E-03 | 2.460 | 10.8 | 6.04E-03 | 2.42 | 10.6 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X014) | 1289 | 2.89E-03 | 3.210 | 14.06 | 3.46E-03 | 4.46 | 19.63 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X015) | 400 | 2.49E-03 | 0.996 | 4.36 | 3.46E-03 | 1.38 | 6.06 | N/A | N/A | N/A | N/A | N/A | N/A |
| Hot Air Curing (X016) | 400 | 2.49E-03 | 0.996 | 4.36 | 3.46E-03 | 1.38 | 6.06 | N/A | N/A | N/A | N/A | N/A | N/A |
| Mixing and Milling (X018) | 417 | 4.44E-04 | 0.185 | 0.810 | 1.40E-04 | 0.058 | 0.256 | 9.25E-04 | 0.385 | 1.69 | 98.00% | 0.008 | 0.034 |
| Totals: | | | 24.7 | 108.0 | | 22.3 | 97.9 | | 0.386 | 1.69 | | 0.009 | 0.038 |

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12, 06/99
 VOC emission factor is derived from stack test results obtained by Wisconsin DNR for polyethylene plastic processing facilities
 Emission factors are for the worst case compound for each pollutant

Appendix A: Emission Calculations
HAP Emission Calculations
Individual HAP emissions when using worst case total HAP materials

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Renewal No.: T087-21424-00031
Plt ID: 087-00031
Reviewer: GS/EVP
Date: 4/17/2006

Hot Air Curing

| HAP | Worst Case Emission Factor | Potential Rubber Throughput | Potential Emissions | Potential Emissions |
|----------------------------|----------------------------|-----------------------------|---------------------|---------------------|
| | (lb/lb rubber) | (lbs/hr) | (lbs/hr) | (tons/yr) |
| 1,1,1 Trichloroethane | 1.48E-06 | 2089 | 0.003 | 0.014 |
| 2-Butanone (MEK) | 2.56E-05 | 2089 | 0.053 | 0.234 |
| Acetophenone | 3.58E-07 | 2089 | 0.001 | 0.003 |
| Aniline | 1.26E-05 | 2089 | 0.026 | 0.115 |
| bis(2-Ethylhexyl)phthalate | 5.92E-08 | 2089 | 0.000 | 0.001 |
| Chloroethane | 4.95E-06 | 2089 | 0.010 | 0.045 |
| Chloromethane | 2.18E-05 | 2089 | 0.046 | 0.199 |
| Cumene | 2.32E-07 | 2089 | 0.000 | 0.002 |
| Ethyl Acrylate | 1.16E-04 | 2089 | 0.242 | 1.06 |
| Hexane | 2.78E-03 | 2089 | 5.807 | 25.4 |
| Xylenes | 2.42E-05 | 2089 | 0.051 | 0.221 |
| Methylene Chloride | 4.08E-04 | 2089 | 0.852 | 3.73 |
| Naphthalene | 9.87E-07 | 2089 | 0.002 | 0.009 |
| Phenol | 3.13E-05 | 2089 | 0.065 | 0.286 |
| Toluene | 2.55E-05 | 2089 | 0.053 | 0.233 |

Autoclave Curing

| HAP | Worst Case Emission Factor | Potential Rubber Throughput | Potential Emissions | Potential Emissions |
|----------------------------|----------------------------|-----------------------------|---------------------|---------------------|
| | (lb/lb rubber) | (lbs/hr) | (lbs/hr) | (tons/yr) |
| 1,4 Dichlorobenzene | 2.53E-08 | 800 | 0.00002 | 0.0001 |
| 2-Butanone (MEK) | 1.24E-06 | 800 | 0.001 | 0.004 |
| 2-Methylphenol | 6.93E-09 | 800 | 0.00001 | 0.00002 |
| Acetaldehyde | 3.22E-07 | 800 | 0.000 | 0.001 |
| Acetophenone | 9.76E-08 | 800 | 0.0001 | 0.0003 |
| Benzene | 2.07E-05 | 800 | 0.017 | 0.073 |
| Biphenyl | 3.14E-08 | 800 | 0.00003 | 0.0001 |
| bis(2-Ethylhexyl)phthalate | 2.73E-07 | 800 | 0.0002 | 0.001 |
| Carbon Disulfide | 5.93E-03 | 800 | 4.74 | 20.8 |
| Carbonyl Sulfide | 4.17E-05 | 800 | 0.033 | 0.146 |
| Cumene | 1.46E-06 | 800 | 0.001 | 0.005 |
| Dibenzofuran | 2.81E-09 | 800 | 0.000002 | 0.00001 |
| Dimethylphthalate | 3.02E-09 | 800 | 0.000002 | 0.00001 |
| Epichlorohydrin | 1.85E-06 | 800 | 0.001 | 0.006 |
| Ethylbenzene | 2.55E-06 | 800 | 0.002 | 0.009 |
| Hexane | 3.22E-06 | 800 | 0.003 | 0.011 |
| Isocytane | 5.23E-07 | 800 | 0.000 | 0.002 |
| Xylenes | 1.68E-05 | 800 | 0.013 | 0.059 |
| Naphthalene | 1.64E-07 | 800 | 0.0001 | 0.001 |
| Phenol | 4.75E-08 | 800 | 0.00004 | 0.0002 |
| Styrene | 1.86E-07 | 800 | 0.0001 | 0.001 |
| t-Butyl Methyl Ether | 7.31E-09 | 800 | 0.00001 | 0.00003 |
| Toluene | 1.59E-05 | 800 | 0.013 | 0.056 |

Mixing and Milling

| HAP | Worst Case Emission Factor | Potential Rubber Throughput | Potential Emissions | Potential Emissions |
|----------------------------|----------------------------|-----------------------------|---------------------|---------------------|
| | (lb/lb rubber) | (lbs/hr) | (lbs/hr) | (tons/yr) |
| 1,1,1 Trichloroethane | 6.03E-08 | 417 | 0.00003 | 0.00011 |
| 2-Butanone (MEK) | 1.04E-06 | 417 | 0.00043 | 0.00190 |
| Acetophenone | 1.45E-08 | 417 | 0.00001 | 0.00003 |
| Aniline | 5.13E-07 | 417 | 0.00021 | 0.00094 |
| Benzene | 4.62E-08 | 417 | 0.00002 | 0.00008 |
| bis(2-Ethylhexyl)phthalate | 2.40E-09 | 417 | 0.000001 | 0.00000 |
| Cadmium Compounds | 2.65E-09 | 417 | 0.000001 | 0.00000 |
| Chloroethane | 2.01E-07 | 417 | 0.00008 | 0.00037 |
| Chloromethane | 8.86E-07 | 417 | 0.00037 | 0.00162 |
| Chromium Compounds | 4.20E-08 | 417 | 0.00002 | 0.00008 |
| Cumene | 9.43E-09 | 417 | 0.00000 | 0.00002 |
| Ethyl Acrylate | 1.45E-07 | 417 | 0.00006 | 0.00026 |
| Hexane | 1.13E-04 | 417 | 0.04712 | 0.20639 |
| Xylenes | 1.06E-06 | 417 | 0.00044 | 0.00194 |
| Methylene Chloride | 1.65E-05 | 417 | 0.00688 | 0.03014 |
| Naphthalene | 4.01E-08 | 417 | 0.00002 | 0.00007 |
| Nickel Compounds | 3.21E-08 | 417 | 0.00001 | 0.00006 |
| Phenol | 1.27E-06 | 417 | 0.00053 | 0.00232 |
| Tetrachloroethene | 4.10E-06 | 417 | 0.00171 | 0.00749 |
| Toluene | 1.04E-06 | 417 | 0.00043 | 0.00190 |

Extruding

| HAP | Worst Case Emission Factor | Potential Rubber Throughput | Potential Emissions | Potential Emissions |
|----------------------------|----------------------------|-----------------------------|---------------------|---------------------|
| | (lb/lb rubber) | (lbs/hr) | (lbs/hr) | (tons/yr) |
| 1,1,1 Trichloroethane | 3.23E-08 | 8417 | 0.0003 | 0.001 |
| 2-Butanone (MEK) | 5.57E-07 | 8417 | 0.005 | 0.021 |
| Acetophenone | 7.79E-09 | 8417 | 0.0001 | 0.0003 |
| Aniline | 2.75E-07 | 8417 | 0.002 | 0.010 |
| bis(2-Ethylhexyl)phthalate | 1.29E-09 | 8417 | 0.00001 | 0.00005 |
| Chloroethane | 1.08E-07 | 8417 | 0.001 | 0.004 |
| Chloromethane | 4.75E-07 | 8417 | 0.004 | 0.018 |
| Chromium | 2.59E-09 | 8417 | 0.00002 | 0.00010 |
| Cumene | 5.05E-09 | 8417 | 0.00004 | 0.0002 |
| Ethylacrylate | 2.53E-06 | 8417 | 0.021 | 0.093 |
| Hexane | 6.05E-05 | 8417 | 0.509 | 2.23 |
| Xylenes | 5.28E-07 | 8417 | 0.004 | 0.019 |
| Methylene Chloride | 8.87E-06 | 8417 | 0.075 | 0.327 |
| Naphthalene | 2.15E-08 | 8417 | 0.00018 | 0.0008 |
| Nickel | 1.98E-09 | 8417 | 0.00002 | 0.00007 |
| Phenol | 6.80E-07 | 8417 | 0.006 | 0.025 |
| Toluene | 5.55E-07 | 8417 | 0.005 | 0.020 |

Emission Factors from Tables 4.12-6, 4.12-9, 4.12-10 and 4.12-4 of AP-42 draft Section 4.12, 06/99.
 These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.