



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: September 15, 2005
RE: Kawneer Rubber and Plastics / 039-21667-00520
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05



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

Mitchell E. Daniels, Jr.
Governor

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September 15, 2005

Ms. Angela O'Hara
Kawneer Rubber and Plastics
P.O. Box 639
Bristol, IN 46507

Re: Exempt Construction and Operation Status,
039-21667-00520

Dear Ms. O'Hara:

The application from Kawneer Rubber and Plastics received on August 24, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary rubber and plastic extrusions manufacturing source, to be located at 1151 Bloomingdale Drive, Bristol, IN 46507 is classified as exempt from air pollution permit requirements:

- (a) three (3) rubber extrusion lines, designated as RE-1, RE-2, and RE-4, each constructed between 1991-1995, with a total maximum capacity of 1,100 pounds of rubber per hour, venting to the indoors, and each equipped with a salt bath curing unit that exhaust to Stacks S-7, S-4, and S-1, respectively;
- (b) three (3) plastic extrusion lines, designated as PE-1 and PE-2, each constructed in 1991, and PE-3, constructed in 2005, with a total maximum capacity of 975 pounds of plastic resin per hour, venting to the indoors;
- (c) four (4) natural gas-fired salt line heaters, designated as SLH-1, SLH-2, SLH-3, and SLH-4, each constructed in 1991, each rated at 0.41 MMBtu/hr, and exhausting to Stacks S-8, S-9, S-5, and S-6, respectively;
- (d) two (2) natural gas-fired salt line heaters, designated as SLH-5 and SLH-6, each constructed in 2000, each rated at 0.5 MMBtu/hr, and exhausting to Stacks S-2 and S-3, respectively;
- (e) one (1) natural gas-fired furnace, designated as F-1, constructed in 2001, rated at 0.06 MMBtu/hr, and exhausting to Stack S-10;
- (f) one (1) natural gas-fired furnace, designated as F-2, constructed in 1991, rated at 0.064 MMBtu/hr, and exhausting to Stack S-11;
- (g) one (1) natural gas-fired furnace, designated as F-3, constructed in 1991, rated at 0.125 MMBtu/hr, and exhausting to Stack S-12;
- (h) two (2) natural gas-fired water heaters, designated as WH-1 and WH-2, each constructed in 1991, each rated at 0.036 MMBtu/hr and 0.032 MMBtu/hr, and each exhausting to Stacks S-13 and S-14, respectively;
- (i) one (1) natural gas-fired air makeup unit, designated as AM-1, constructed in 1991, rated at 0.55 MMBtu/hr, and venting to the indoors;
- (j) one (1) natural gas-fired air makeup unit, designated as AM-2, constructed in 1995, rated at 2.324 MMBtu/hr, and venting to the indoors;

The following conditions shall be applicable:

- (a) 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:
- (1) 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.
 - (2) 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.
- (b) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (c) Pursuant 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units), particulate matter emissions from the salt line heaters and water heaters constructed in 1991 (SLH-1, SLH-2, SLH-3, SLH-4, WH-1, and WH-2) and the salt line heaters constructed in 2000 (SLH-5 and SLH-6) shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where } Pt = \text{Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and}$$
$$Q = \text{Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.}$$

Pursuant to this rule, the total particulate emissions from the from the salt line heaters and water heaters constructed in 1991 (SLH-1, SLH-2, SLH-3, SLH-4, WH-1, and WH-2) shall not exceed 0.6 lb/MMBtu, based on a total source maximum operating capacity of 1.70 MMBtu/hr in 1991, and the total particulate emissions from the from the salt line heaters constructed in 2000 (SLH-5 and SLH-6) shall not exceed 0.6 lb/MMBtu, based on a total source maximum operating capacity of 2.70 MMBtu/hr in 2000.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Nathan C. Bell, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Original signed by

Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

ncb

cc: File - Elkhart County
Elkhart County Health Department
IDEM Northern Regional Office
Air Compliance - Paul Karkiewicz
Permit Tracking
Compliance Data Section
Administrative and Development

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Kawneer Rubber and Plastics
Source Location: 1151 Bloomingdale Drive, Bristol, IN 46507
County: Elkhart
SIC Codes: 3053 (Manufacturing of Gaskets, Packing, and Sealing Devices)
3082 (Manufacturing of Unsupported Plastics Profile Shapes)
3061 (Manufacturing of Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
Application No.: 039-21667-00520
Reviewer: Nathan C. Bell

On August 24, 2005, the Office of Air Quality (OAQ) received an application from Kawneer Rubber and Plastics relating to the operation of a stationary rubber and plastic extrusions manufacturing source. The source primarily engages in extrusion of purchased resins. This manufacturing process is considered a finishing process (blending, additives introduction, curing, extruding/pultruding, annealing, cooling and drying, and/or pelletizing of thermoplastic resins).

Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following:

- (a) three (3) rubber extrusion lines, designated as RE-1, RE-2, and RE-4, each constructed between 1991-1995, with a total maximum capacity of 1,100 pounds of rubber per hour, venting to the indoors, and each equipped with a salt bath curing unit that exhaust to Stacks S-7, S-4, and S-1, respectively;
- (b) three (3) plastic extrusion lines, designated as PE-1 and PE-2, each constructed in 1991, and PE-3, constructed in 2005, with a total maximum capacity of 975 pounds of plastic resin per hour, venting to the indoors;
- (c) four (4) natural gas-fired salt line heaters, designated as SLH-1, SLH-2, SLH-3, and SLH-4, each constructed in 1991, each rated at 0.41 MMBtu/hr, and exhausting to Stacks S-8, S-9, S-5, and S-6, respectively;
- (d) two (2) natural gas-fired salt line heaters, designated as SLH-5 and SLH-6, each constructed in 2000, each rated at 0.5 MMBtu/hr, and exhausting to Stacks S-2 and S-3, respectively;
- (e) one (1) natural gas-fired furnace, designated as F-1, constructed in 2001, rated at 0.06 MMBtu/hr, and exhausting to Stack S-10;
- (f) one (1) natural gas-fired furnace, designated as F-2, constructed in 1991, rated at 0.064 MMBtu/hr, and exhausting to Stack S-11;
- (g) one (1) natural gas-fired furnace, designated as F-3, constructed in 1991, rated at 0.125 MMBtu/hr, and exhausting to Stack S-12;

- (h) two (2) natural gas-fired water heaters, designated as WH-1 and WH-2, each constructed in 1991, each rated at 0.036 MMBtu/hr and 0.032 MMBtu/hr, and each exhausting to Stacks S-13 and S-14, respectively;
- (i) one (1) natural gas-fired air makeup unit, designated as AM-1, constructed in 1991, rated at 0.55 MMBtu/hr, and venting to the indoors;
- (j) one (1) natural gas-fired air makeup unit, designated as AM-2, constructed in 1995, rated at 2.324 MMBtu/hr, and venting to the indoors;

Existing Approvals

No previous air approvals have been issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-1	molten salt bath cure for RH-4	38	1.00	3,800	140
S-2	natural gas-fired salt line heater SLH-5	27	0.50	1,000	150
S-3	natural gas-fired salt line heater SLH-6	27	0.50	1,000	150
S-4	molten salt bath cure for RH-2	38	1.00	3,800	140
S-5	natural gas-fired salt line heater SLH-3	27	0.67	1,000	140
S-6	natural gas-fired salt line heater SLH-4	27	0.67	1,000	150
S-7	molten salt bath cure for RH-1	38	1.00	3,200	140
S-8	natural gas-fired salt line heater SLH-1	27	0.67	1,000	150
S-9	natural gas-fired salt line heater SLH-2	27	0.67	1,000	150
S-10	natural gas-fired furnace F-1	20	0.50	250	100
S-11	natural gas-fired furnace F-2	20	0.50	250	100
S-12	natural gas-fired furnace F-3	20	0.50	250	100
S-13	natural gas-fired water heater WH-1	20	0.50	No Fan	Ambient
S-14	natural gas-fired water heater WH-2	20	0.50	No Fan	Ambient
S-15	natural gas-fired radiant heater RH-1	20	0.50	250	100

Recommendation

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

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

An application for the purposes of this review was received on August 24, 2005.

Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 through 3).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	0.05
PM-10	0.19
SO ₂	0.02
NO _x	2.55
VOC	6.27
CO	2.14
Worst Single HAP	3.17 (Carbon Disulfide)
Combination HAPs	5.11

- (a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment or Unclassifiable
1-Hour Ozone	Maintenance Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standard. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable for all the other regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD and Emission Offset Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.05
PM-10	0.19
SO ₂	0.02
NO _x	2.55
VOC	6.27
CO	2.14
Worst Single HAP	3.17 (Carbon Disulfide)
Combination HAPs	5.11

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This new source is not a Emission Offset major stationary source because no regulated nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the PTE of:

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

This status is based on the potential to emit calculations of the source (see Appendix A).

Federal Rule Applicability

- (a) This source is not subject to the following NESHAPs, because this source is not a major source of HAPs and this source primarily engages in manufactures rubber and plastic extrusions from purchased rubber stock and plastic resin pellets under SIC Codes 3053, 3082, and 3061, and does not manufacture chemicals.
 - (1) 40 CFR 63 Subpart F (63.100 through 63.107), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry (326 IAC 20-11-1)
 - (2) 40 CFR 63 Subpart G (63.110 through 63.153), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (326 IAC 20-11-1)
 - (3) 40 CFR 63 Subpart H (63.160 through 63.183), NESHAPs: Organic Hazardous Air Pollutants for Equipment Leaks (326 IAC 20-11-1)
 - (4) 40 CFR 63 Subpart I (63.190 through 63.193), NESHAPs: Certain Processes Subject to the Negotiated Regulation for Equipment Leaks (326 IAC 20-12-1)
- (b) This source is not subject to the requirements of 40 CFR 63 Subpart J (63.210 through 63.217) - NESHAPs: Polyvinyl Chloride and Copolymers Production (326 IAC 20-69-1), because this source is not a PVC plant (i.e., is not a plant where vinyl chloride alone or in combination with other materials is polymerized; 40 CFR 61.61(c)) and is not a major source of HAPs.
- (c) This source is not subject to the requirements of 40 CFR 63 Subpart U (63.480 through 63.507) NESHAP Emission: Group I Polymers and Resins (326 IAC 20-19-1), because this source is not a major source of HAPs.
- (d) This source is not subject to the requirements of 40 CFR 63 Subpart W (63.520 through 63.529) NESHAPs: Group II Polymers and Resins, Epoxy Resins Production and Non-Nylon Polyamides Production (326 IAC 20-20-1), because this source is not a major source of HAPs.
- (e) This source is not subject to the requirements of 40 CFR 63 Subpart OOO (63.1400 through 63.1419) NESHAPs: Group III Polymers and Resins (326 IAC 20-58-1), because this source is not a major source of HAPs.
- (f) This source is not subject to the requirements of 40 CFR 63 Subpart JJJ (63.1310 through 63.1335) NESHAP Emissions: Group IV Polymers and Resins (326 IAC 20-21-1), because the source is not a major source of HAPs and only performs finishing processes (blending, additives introduction, curing, extruding, pultruding, annealing, cooling and drying, pelletizing of thermoplastic resins), which are specifically exempt from the requirements of this rule under 40 CFR 63.1310(d).
- (g) This source is not subject to the requirements of 40 CFR 63 Subpart YY (63.1100 through 63.1114) - NESHAPs for Source Categories: Generic Maximum Achievable Control Technology Standards (326 IAC 20-44-1), because this source is not one of the source categories or affected sources specified in 40 CFR 63.1103(a) through (h). This source manufactures rubber and plastic extrusions from purchased rubber stock and plastic resin pellets.
- (h) This source is not subject to the requirements of the 40 CFR 63, Subpart III (40 CFR Part 63.1290 - 63.1309) - NESHAPs: Flexible Polyurethane Foam Production (326 IAC 20-22-1), because the source does not produce flexible polyurethane or rebond foam as defined by 40 CFR 63.1292.

- (i) This source is not subject to the requirements of 40 CFR 63, Subpart PPP (60.1420 through 60.1439), NESHAP for Polyether Polyols Production (326 IAC 20-59-1), because this source does not manufacture a polyether polyol.
- (j) This source is not subject to the requirements of 40 CFR 63 Subpart WWWW (63.5780 through 63.5935) - NESHAPs: Reinforced Plastic Composites Production (326 IAC 20-25-1), because this source is not a major source of HAPs.
- (k) This source is not subject to the requirements of 40 CFR 63, Subpart DDDDD, (63.7480 through 63.7575), NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters, because the source is not a major source of HAPs.
- (l) This source is not subject to the requirements of 40 CFR 63 Subpart MMMMM (63.8780 through 63.8830) - NESHAPs: Flexible Polyurethane Foam Fabrication Operation (326 IAC 20-66-1), because this source does not perform fabrication of flexible polyurethane foam as defined by 40 CFR 63.8782.
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.
- (n) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart BBB (60.540 through 60.548), Standards of Performance for Rubber Tire Manufacturing Industry, because this source does not manufacture rubber tires (i.e., SIC Code 3011). This source manufactures rubber and plastic extrusions from purchased rubber stock and plastic resin pellets under SIC Codes 3053, 3082, and 3061.
- (o) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart DDD (60.560 through 60.566), Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, because this source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR 60.561. This source manufactures rubber and plastic extrusions from purchased rubber stock and plastic resin pellets under SIC Codes 3053, 3082, and 3061, and does not manufacture synthetic resins through predominantly chemical processes (e.g., SIC Codes 2821 and 2824).
- (p) This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart III (60.610 through 60.617), Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes, because this source does not produce any of the compounds or chemicals listed in 40 CFR 60.617 (as a product, co-product, by-product, or intermediate) for sale as a final product as that chemical, or for use in the production of other chemicals or compounds.
- (q) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

State Rule Applicability - Entire Source

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

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(y)(1), no major modifications were done to this source, and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. The uncontrolled potential to emit of VOC and NOx are each less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable, since each of the emission units at this source does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

State Rule Applicability - Rubber Extrusion Lines Operations

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

Pursuant to 326 IAC 6-3-1(b)(14), each of the rubber extrusion lines are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

State Rule Applicability - Plastic Extrusion Lines Operations

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

Pursuant to 326 IAC 6-3-1(b)(14), each of the plastic extrusion lines are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

State Rule Applicability – Natural Gas Combustion Sources

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

- (a) Each of the natural gas-fired furnaces and air makeup units are not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (b) The natural gas-fired salt line heaters and the natural gas-fired water heaters are subject to the requirements of 326 IAC 6-2-4, since each of the units are sources of indirect heating, were constructed after September 21, 1983, and are located in Elkhart County. Pursuant to this rule, particulate matter emissions from the salt line heaters and water heaters constructed in 1991 (SLH-1, SLH-2, SLH-3, SLH-4, WH-1, and WH-2) and the salt line heaters constructed in 2000 (SLH-5 and SLH-6) shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where } Pt = \text{Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and}$$
$$Q = \text{Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.}$$

Pursuant to this rule, the total particulate emissions from the from the salt line heaters and water heaters constructed in 1991 (SLH-1, SLH-2, SLH-3, SLH-4, WH-1, and WH-2) shall not exceed 0.6 lb/MMBtu, based on a total source maximum operating capacity of 1.70 MMBtu/hr in 1991, and the total particulate emissions from the from the salt line heaters constructed in 2000 (SLH-5 and SLH-6) shall not exceed 0.6 lb/MMBtu, based on a total source maximum operating capacity of 2.70 MMBtu/hr in 2000.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired furnaces and air makeup units are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour and are not considered manufacturing processes as defined by 326 IAC 6-3.1-5(2).
- (b) Pursuant to 326 IAC 6-3-1(b)(1), each of the salt line heaters and water heaters are exempt from the requirements of 326 IAC 6-3, because they each are sources of indirect heating.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired furnaces, air makeup units, salt line heaters, and water heaters are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached exemption, No 039-21667-00520.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Kawneer Rubber and Plastics
Address City IN Zip: 1151 Bloomingdale Drive, Bristol, IN 46507
Permit Number: 039-21667
Plt ID: 039-00520
Reviewer: Nathan C. Bell
Date: September 12, 2005**

Category	Pollutant	Uncontrolled Potential Emissions (tons/year)				Controlled Potential Emissions (tons/year)				
		Emissions Generating Activity				Emissions Generating Activity				
		Rubber Extrusion & Curing	Plastic Extrusion & Curing	Natural Gas Combustion	TOTAL	Rubber Extrusion & Curing	Plastic Extrusion & Curing	Natural Gas Combustion	TOTAL	
Criteria Pollutants	PM	1.3E-04		0.05	0.05	1.3E-04		0.05	0.05	
	PM10	1.3E-04		0.19	0.19	1.3E-04		0.19	0.19	
	SO2			0.02	0.02			0.02	0.02	
	NOx			2.55	2.55			2.55	2.55	
	VOC	3.99	2.14	0.14	6.27	3.99	2.14	0.14	6.27	
	CO			2.14	2.14			2.14	2.14	
Hazardous Air Pollutants	1,1,1-Trichloroethane	6.9E-05			6.9E-05	6.9E-05			6.9E-05	
	1,1-Dichloroethene	2.6E-04			2.6E-04	2.6E-04			2.6E-04	
	1,3-Butadiene	6.3E-03			6.3E-03	6.3E-03			6.3E-03	
	2-Butanone	1.3E-03			1.3E-03	1.3E-03			1.3E-03	
	4-Methyl-2-Pentanone	3.3E-04			3.3E-04	3.3E-04			3.3E-04	
	Acetophenone	1.03			1.03	1.03			1.03	
	Acrylonitrile	1.8E-04			1.8E-04	1.8E-04			1.8E-04	
	Aniline	7.3E-04			7.3E-04	7.3E-04			7.3E-04	
	Benzene	0.24		5.4E-05	0.24	0.24		5.4E-05	0.24	
	Biphenyl	1.9E-03			1.9E-03	1.9E-03			1.9E-03	
	bis(2-Ethylhexyl)phthalate	1.3E-03			1.3E-03	1.3E-03			1.3E-03	
	Carbon Disulfide	3.17			3.17	3.17			3.17	
	Carbonyl Sulfide	0.06			0.06	0.06			0.06	
	Chloromethane	9.6E-05			9.6E-05	9.6E-05			9.6E-05	
	Chromium Compounds	1.3E-06		3.6E-05	3.7E-05	1.3E-06		3.6E-05	3.7E-05	
	Cumene	6.4E-04			6.4E-04	6.4E-04			6.4E-04	
	Dibenzofuran	0.01			0.01	0.01			0.01	
	Dimethylphthalate	1.5E-04			1.5E-04	1.5E-04			1.5E-04	
	Di-n-butylphthalate	1.9E-05			1.9E-05	1.9E-05			1.9E-05	
	Ethylbenzene	2.9E-04			2.9E-04	2.9E-04			2.9E-04	
	Hexane	0.02		0.05	0.06	0.02		0.05	0.06	
	Isooctane	6.4E-04			6.4E-04	6.4E-04			6.4E-04	
	o-, m-, p-Xylenes	0.02			0.02	0.02			0.02	
	Methylene Chloride	0.02			0.02	0.02			0.02	
	Naphthalene	5.2E-03			5.2E-03	5.2E-03			5.2E-03	
	Nickel Compounds	1.0E-05		5.4E-05	6.4E-05	1.0E-05		5.4E-05	6.4E-05	
	Phenol	1.7E-03			1.7E-03	1.7E-03			1.7E-03	
	Styrene	2.2E-03			2.2E-03	2.2E-03			2.2E-03	
	Tetrachloroethene	2.0E-04			2.0E-04	2.0E-04			2.0E-04	
	Toluene	0.02		8.7E-05	0.02	0.02		8.7E-05	0.02	
	Dichlorobenzene			3.1E-05	3.1E-05			3.1E-05	3.1E-05	
	Formaldehyde		0.21	1.9E-03	2.2E-01		0.21	1.9E-03	2.2E-01	
Lead			1.3E-05	1.3E-05			1.3E-05	1.3E-05		
Cadmium			2.8E-05	2.8E-05			2.8E-05	2.8E-05		
Manganese			9.7E-06	9.7E-06			9.7E-06	9.7E-06		
Total HAPs		4.85	0.21	0.05	5.11	4.85	0.21	0.05	5.11	
		Worse Case HAP			3.17		Worse Case HAP			3.17

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emissions Calculations
Rubber and Plastic Extrusion and Curing**

**Company Name: Kawneer Rubber and Plastics
Address City IN Zip: 1151 Bloomingdale Drive, Bristol, IN 46507
Permit Number: 039-21667
Plt ID: 039-00520
Reviewer: Nathan C. Bell
Date: September 12, 2005**

Rubber Extrusion and Curing

Total Combined Capacity for Rubber Extrusion/Curing = 1100 lbs/hr

Category	Pollutant	Rubber Extrusion for AP-42 Compound #8				Rubber Hot Air Curing for AP-42 Compound #8				Total Potential Emissions (tons/year)
		AP-42 Table 4.12-6 Emission Factor (lb/lb rubber)	Potential Emissions (lbs/hr)	Potential Emissions (lbs/year)	Potential Emissions (tons/year)	AP-42 Table 4.12-10 Emission Factor (lb/lb rubber)	Potential Emissions (lbs/hr)	Potential Emissions (lbs/year)	Potential Emissions (tons/year)	
Criteria	PM/PM10	2.67E-08	2.9E-05	0.26	1.3E-04	0	0	0	0	1.3E-04
Pollutants	VOC	3.52E-06	3.9E-03	33.92	0.02	8.25E-04	0.91	7950	3.97	3.99
Hazardous	Total HAPs	2.99E-05	0.03	288.1	0.14	9.76E-04	1.07	9405	4.70	4.85
Air Pollutants	1,1,1-Trichloroethane	1.43E-08	1.6E-05	0.14	6.9E-05	0	0	0	0	6.9E-05
	1,1-Dichloroethene	5.37E-08	5.9E-05	0.52	2.6E-04	0	0	0	0	2.6E-04
	1,3-Butadiene	6.04E-08	6.6E-05	0.58	2.9E-04	1.24E-06	1.4E-03	11.95	6.0E-03	6.3E-03
	2-Butanone	2.72E-07	3.0E-04	2.62	1.3E-03	0	0	0	0	1.3E-03
	4-Methyl-2-Pentanone	6.80E-08	7.5E-05	0.66	3.3E-04	0	0	0	0	3.3E-04
	Acetophenone	6.91E-09	7.6E-06	0.07	3.3E-05	2.13E-04	0.23	2052	1.03	1.03
	Acrylonitrile	3.65E-08	4.0E-05	0.35	1.8E-04	0	0	0	0	1.8E-04
	Aniline	4.13E-09	4.5E-06	0.04	2.0E-05	1.48E-07	1.6E-04	1.43	7.1E-04	7.3E-04
	Benzene	0	0	0	0	4.88E-05	0.05	470	0.24	0.24
	Biphenyl	0	0	0	0	3.92E-07	4.3E-04	3.78	1.9E-03	1.9E-03
	bis(2-Ethylhexyl)phthalate	0	0	0	0	2.74E-07	3.0E-04	2.64	1.3E-03	1.3E-03
	Carbon Disulfide	1.50E-05	0.02	144.54	0.07	6.43E-04	0.71	6196	3.10	3.17
	Carbonyl Sulfide	1.20E-05	0.01	115.63	0.06	0	0	0	0	0.06
	Chloromethane	2.00E-08	2.2E-05	0.19	9.6E-05	0	0	0	0	9.6E-05
	Chromium Compounds	2.72E-10	3.0E-07	2.6E-03	1.3E-06	0	0	0	0	1.3E-06
	Cumene	5.17E-08	5.7E-05	0.50	2.5E-04	8.08E-08	8.9E-05	0.78	3.9E-04	6.4E-04
	Dibenzofuran	0	0	0	0	2.10E-06	2.3E-03	20.2	0.01	0.01
	Dimethylphthalate	0	0	0	0	3.19E-08	3.5E-05	0.31	1.5E-04	1.5E-04
	Di-n-butylphthalate	4.00E-09	4.4E-06	0.04	1.9E-05	0	0	0	0	1.9E-05
	Ethylbenzene	5.93E-08	6.5E-05	0.57	2.9E-04	0	0	0	0	2.9E-04
	Hexane	6.84E-07	7.5E-04	6.59	3.3E-03	3.13E-06	3.4E-03	30.2	0.02	0.02
	Isooctane	1.32E-07	1.5E-04	1.27	6.4E-04	0	0	0	0	6.4E-04
	o-, m-, p-Xylenes	3.16E-07	3.5E-04	3.04	1.5E-03	4.28E-06	4.7E-03	41.2	0.02	0.02
	Methylene Chloride	2.58E-07	2.8E-04	2.49	1.2E-03	3.61E-06	4.0E-03	34.8	0.02	0.02
	Naphthalene	1.46E-08	1.6E-05	0.14	7.0E-05	1.07E-06	1.2E-03	10.3	5.2E-03	5.2E-03
	Nickel Compounds	2.08E-09	2.3E-06	0.02	1.0E-05	0	0	0	0	1.0E-05
	Phenol	1.71E-08	1.9E-05	0.16	8.2E-05	3.41E-07	3.8E-04	3.29	1.6E-03	1.7E-03
	Styrene	2.21E-08	2.4E-05	0.21	1.1E-04	4.25E-07	4.7E-04	4.10	2.0E-03	2.2E-03
	Tetrachloroethene	4.15E-08	4.6E-05	0.40	2.0E-04	0	0	0	0	2.0E-04
	Toluene	7.05E-07	7.8E-04	6.79	3.4E-03	4.37E-06	4.8E-03	42.1	0.02	0.02

Plastic Extrusion and Curing

Total Combined Capacity for Plastic Extrusion/Curing = 975 lbs/hr
= 0.488 tons/hr

Category	Pollutant	Plastic Extrusion and Curing			
		Emission Factor (lb/ton plastic)	Potential Emissions (lbs/hr)	Potential Emissions (lbs/year)	Potential Emissions (tons/year)
Criteria	PM/PM10	NA	NA	NA	NA
Pollutants	VOC	1.0	0.488	4271	2.14
HAPs	Total HAPs (Formaldehyde)	0.10	0.05	427	0.21

Methodology

Rubber Extrusion Emission Factors are from AP 42, Chapter 4.12, Table 4.12-6, Compound #8

Rubber Curing Emission Factors are from AP 42, Chapter 4.12, Table 4.12-10, Compound #8

Plastic Extrusion Emission Factor of 1.0 lb VOC/ton plastic and 0.1 lb HAP/ton plastic were developed by Wisconsin DNR based from various stack testing of plastic manufacturing sources. EPA has commended its use versus emission factor developed by the Composite Institute, Division of Plastic Industry.

Emission (lbs/hr) = Total Combined Capacity * Emission Factor

Emissions, lbs/day = (Emissions, lbs/hr) x 24 hrs/day

Emissions, tons/yr = (Emissions, lbs/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.

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

Company Name: Kawneer Rubber and Plastics
Address City IN Zip: 1151 Bloomingdale Drive, Bristol, IN 46507
Permit Number: 039-21667
Plt ID: 039-00520
Reviewer: Nathan C. Bell
Date: September 12, 2005

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
					PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)					1.9	7.6	0.6	100	5.5	84.0
Potential Emission tons/yr					PM*	PM10*	SO2	NOx**	VOC	CO
Salt line heaters, SLH-1, -2, -3, and -4	4	0.410	1.6	14.37	0.014	0.055	0.004	0.718	0.040	0.603
Salt line heaters, SLH-5 and SLH-6	2	0.500	1.0	8.76	0.008	0.033	0.003	0.438	0.024	0.368
Furnace F-1	1	0.060	0.1	0.53	0.000	0.002	0.000	0.026	0.001	0.022
Furnace F-2	1	0.064	0.1	0.56	0.001	0.002	0.000	0.028	0.002	0.024
Furnace F-3	1	0.125	0.1	1.10	0.001	0.004	0.000	0.055	0.003	0.046
Water heaters WH-1 and WH-2	2	0.032	0.1	0.56	0.001	0.002	0.000	0.028	0.002	0.024
Air Makeup Unit, AM-1	1	0.550	0.6	4.82	0.005	0.018	0.001	0.241	0.013	0.202
Air Makeup Unit, AM-2	1	2.324	2.32	20.36	1.9E-02	0.077	0.006	1.018	0.056	0.855
Totals	13		5.8		0.048	0.194	0.015	2.552	0.140	2.144

Emission Unit	Pollutant									
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)										
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission tons/yr										
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Salt line heaters, SLH-1, -2, -3, and -4	1.5E-05	8.6E-06	5.4E-04	0.013	2.4E-05	3.6E-06	7.9E-06	1.0E-05	2.7E-06	1.5E-05
Salt line heaters, SLH-5 and SLH-6	9.2E-06	5.3E-06	3.3E-04	0.008	1.5E-05	2.2E-06	4.8E-06	6.1E-06	1.7E-06	9.2E-06
Furnace F-1	5.5E-07	3.2E-07	2.0E-05	0.000	8.9E-07	1.3E-07	2.9E-07	3.7E-07	1.0E-07	5.5E-07
Furnace F-2	5.9E-07	3.4E-07	2.1E-05	0.001	9.5E-07	1.4E-07	3.1E-07	3.9E-07	1.1E-07	5.9E-07
Furnace F-3	1.1E-06	6.6E-07	4.1E-05	0.001	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Water heaters WH-1 and WH-2	5.9E-07	3.4E-07	2.1E-05	0.001	9.5E-07	1.4E-07	3.1E-07	3.9E-07	1.1E-07	5.9E-07
Air Makeup Unit, AM-1	5.1E-06	2.9E-06	1.8E-04	0.004	8.2E-06	1.2E-06	2.6E-06	3.4E-06	9.2E-07	5.1E-06
Air Makeup Unit, AM-2	2.1E-05	1.2E-05	7.6E-04	0.018	3.5E-05	5.1E-06	1.1E-05	1.4E-05	3.9E-06	2.1E-05
Totals	5.4E-05	3.1E-05	1.9E-03	0.046	8.7E-05	1.3E-05	2.8E-05	3.6E-05	9.7E-06	5.4E-05

*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

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

Methodology

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

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

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter

NOx = Nitrous Oxides

DCB = Dichlorobenzene

Cr = Chromium

PM10 = Particulate Matter (<10 um)

VOC - Volatile Organic Compounds

Pb = Lead

Mn = Manganese

SO2 = Sulfur Dioxide

CO = Carbon Monoxide

Cd = Cadmium

Ni = Nickel