INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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*Governor*

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*Commissioner*

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

TO: Interested Parties / Applicant

DATE: August 22, 2006

RE: Freudenberg NOK / 145-23322-00027

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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Mr. Nick Nogalski
Freudenberg – NOK General Partnership
P.O. Box 245
Morristown, Indiana 46176

Re: 145-23322
Notice-only change to
MSOP 145-14928-00027

Dear Mr. Nogalski:

Freudenberg – NOK General Partnership was issued a Minor Source Operating Permit (MSOP) on April 21, 2003 for a stationary rubber parts manufacturing plant located at State Road 44 West, Shelbyville, Indiana 46176. A letter notifying the Office of Air Quality of a notice only change was received on July 3, 2006. The source is adding two (2) PT-60 rubber presses and two (2) PT-90 rubber presses. This modification qualifies as a notice only change to a Minor Source Operating Permit because the PTE of VOC is less than the level listed under 326 IAC 2-6.1-6(g)(4)(c). In addition, the source requested to remove the parts washer, identified as Graymills Clean-O-Matic parts washer, and four (4) transfer rubber presses from the permit. These units have been removed from the premises.

Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows, (bolded language has been added and the language with a line through it has been deleted):

A.2 Emission Units and Pollution Control Equipment Summary

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

….

(f) ~~Seventy-four (74)~~ **Seventy three (73)** rubber presses, using no control, and exhausting to the atmosphere with the following capacities:

….

(4) ~~six (6)~~ **eight (8)** rubber presses, identified as PT-60 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(5) ~~eight (8)~~ **ten (10)** rubber presses, identified as PT-90 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(6) eight (8) rubber presses, identified as SIM60 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(7) ~~nineteen (19)~~ **fifteen (15)** transfer rubber presses, identified as Transfer Presses, each with a maximum capacity of processing 34 pounds of rubber per hour;

….

~~(n) one (1) parts washer, identified as Graymills Clean-O-Matic parts washer, using approximately fifty (50) gallons of cleaner per year;~~

~~(o)~~ **(n)** one (1) vacublast mold cleaning grit blaster with a maximum capacity of processing 2,400 pounds of material per hour, using no control, and exhausting to the atmosphere;

~~(p)~~ **(o)** laboratory equipped with one (1) Banbury Mixer BR 1600 and associated Electric Delta Therm, lab mill with 12" drop mill, one (1) Moriyama Mixer with 16" drop mill, three (3) electric molding presses, four (4) molding ovens, one (1) rubber press, identified as SIM-30, with a maximum capacity of processing 3.4 pounds of rubber per hour;

~~(q)~~ **(p)** two (2) wet blasters; and

~~(r)~~ **(q)** one (1) single-head plastic press, identified as Ossberger Plastic Press, with a maximum capacity of processing 100 pounds plastic per hour, using no control, and exhausting to the atmosphere.

## ~~SECTION D.2 FACILITY OPERATION CONDITIONS~~

~~**Facility Description [326 IAC 2-7-5(15)]:**~~
~~(a) one (1) parts washer, identified as Graymills Clean-O-Matic parts washer, using approximately fifty (50) gallons of cleaner per year.~~
~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

### ~~Emission Limitations and Standards (Cold Cleaning Degreaser Operations)~~

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

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

~~(a) Equip the cleaner with a cover;~~

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

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

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

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

~~(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.~~

~~D.2.2 Volatile Organic Compounds (VOC) [326 8-3-5]~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~

~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

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

(1) The address for IDEM, OAQ has been corrected throughout the MSOP to 100 North Senate Avenue, Indianapolis, Indiana 46204-2251.

(2) The Table of Contents has been revised accordingly.

(3) Condition B.11 has been revised to reflect a departmental name change.

~~B.11 Annual Fee Payment [326 IAC 2-1.1-7]~~

~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.~~

~~(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.~~

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

**(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.**

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, at (973) 575-2555, ext. 3284 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Nisha Sizemore, Chief
Permit Branch
Office of Air Quality

Attachments
LQ/EVP
cc: File – Shelby County
U.S. EPA, Region V
Shelby County Health Department
Air Compliance Section Inspector – DJ Knotts
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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# Minor Source Operating Permit
# OFFICE OF AIR QUALITY

## Freudenberg - NOK General Partnership
## State Road 44 West
## Shelbyville, Indiana 46176

(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.

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

| Operation Permit No.: MSOP 145-14928-00027 | |
|---|---|
| Original Signed by:<br>Paul Dubenetzky, Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: April 21, 2003<br><br>Expiration Date: April 21, 2008 |

First Notice Only Change No.: 145-18557-00027, issued January 13, 2004
Second Notice Only Change No.: 145-20570-00027, issued February 15, 2005
Third Notice Only Change No.: 145-21992-00027, issued December 6, 2005
Fourth Notice Only Change No.: 145-22737-00027, issued March 27, 2006

| Fifth Notice Only Change No.: 145-23322-00027 | |
|---|---|
| Signed by:<br>Nisha Sizemore, Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date:<br><br>Expiration Date: April 21, 2008 |

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## SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a rubber parts manufacturing plant.

| | |
|---|---|
| Authorized Individual: | General Manager |
| Source Address: | State Road 44 West, Shelbyville, Indiana 46176 |
| Mailing Address: | State Road 44 West, Shelbyville, Indiana 46176 |
| General Source Phone Number: | 317-392-2571 |
| SIC Code: | 3053 |
| County Location: | Shelby |
| | Source Location Status: |
| | Nonattainment for 8-hour Ozone Standard |
| | Attainment for all other criteria pollutants |
| Source Status: | Minor Source Operating Permit Program |
| | Minor Source, under PSD and Emission Offset Rules |

### A.2 Emission Units and Pollution Control Equipment Summary

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

(a) one (1) rubber mixer, identified as #1 Mixer, with a maximum capacity of processing 1,080 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack identified as 929034;

(b) one (1) rubber mixer, identified as #2 Mixer, with a maximum capacity of processing 1,215 pounds of raw material per hour, with two (2) baghouses for particulate matter control, exhausting to two (2) stacks, identified as 909002 and 909003;

(c) one (1) rubber mixer, identified as 35L Moriyama Mixer, with a maximum capacity of processing 225 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as 919005;

(d) one (1) rubber mixer, identified as 55L Rubber Mixer, with a maximum capacity of processing 440 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as 959008;

(e) three (3) rubber extruders, identified as Barwell Rubber Extruders, each with a maximum capacity of processing 700 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(f) Seventy-three (73) rubber presses, using no control, and exhausting to the atmosphere with the following capacities:

(1) eight (8) rubber presses, identified as R-100 Boots Presses, each with a maximum capacity of processing 25.8 pounds of rubber per hour;
(2) ten (10) rubber presses, identified as N-50 Boots Presses, each with a maximum capacity of processing 7.0 pounds of rubber per hour;

(3) seven (7) rubber presses, identified as DC-60 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(4) eight (8) rubber presses, identified as PT-60 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(5) ten (10) rubber presses, identified as PT-90 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(6) eight (8) rubber presses, identified as SIM60 Presses, each with a maximum capacity of processing 7.1 pounds of rubber per hour;
(7) fifteen (15) transfer rubber presses, identified as Transfer Presses, each with a maximum capacity of processing 34 pounds of rubber per hour;
(8) one (1) rubber press, identified as Zone C-02 Press, with a maximum capacity of processing 3 pounds of rubber per hour; and
(9) five (5) rubber presses, identified as NT-160 Presses, each with a maximum capacity of processing 14.2 pounds of rubber per hour; and
(10) one (1) rubber press, identified as DESMA 110, with a maximum capacity of processing 3.4 pounds of rubber per hour.

(g) one (1) single-head plastic injection molding press, identified as Ossberger Plastic Press - single-head, with a maximum capacity of processing 26.7 pounds of plastic per hour, using no control, and exhausting to the atmosphere;

(h) three (3) double-head plastic injection molding presses, identified as Ossberger Plastic Presses - double-head, each with a maximum capacity of processing 53.4 pounds of plastic per hour, using no control, and exhausting to the atmosphere;

(i) one (1) 42-inch rubber warm-up mill, identified as 42-inch rubber warm-up mill, with a maximum capacity of processing 700 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(j) two (2) 60-inch rubber warm-up mills, identified as 60-inch rubber warm-up mills, each with a maximum capacity of processing 422 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(k) one (1) electric post-curing oven, identified as N-50 Grieve electric post-curing oven, with a maximum capacity of processing 72 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(l) one (1) electric post-curing oven, identified as Despatch electric post-curing oven, with a maximum capacity of processing 41 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(m) two (2) rubber dip baths, identified as rubber dip bath for #1 Mixer and rubber dip bath for #2 Mixer, each with a maximum capacity of coating 1,080 pounds of rubber per hour, using no control, and exhausting to the atmosphere;

(n) one (1) vacublast mold cleaning grit blaster with a maximum capacity of processing 2,400 pounds of material per hour, using no control, and exhausting to the atmosphere;

(o) laboratory equipped with one (1) Banbury Mixer BR 1600 and associated Electric Delta Therm, lab mill with 12" drop mill, one (1) Moriyama Mixer with 16" drop mill, three (3) electric molding presses, four (4) molding ovens, one (1) rubber press, identified as SIM-30, with a maximum capacity of processing 3.4 pounds of rubber per hour;

(p) two (2) wet blasters; and

(q) one (1) single-head plastic press, identified as Ossberger Plastic Press, with a maximum capacity of processing 100 pounds plastic per hour, using no control, and exhausting to the atmosphere.

## SECTION B GENERAL CONDITIONS

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

### B.1 Permit No Defense [IC 13]

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

### B.2 Definitions

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

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

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

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

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

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

### B.5 Modification to Permit [326 IAC 2]

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

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

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

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

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

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

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

considered timely if received by IDEM, OAQ on or before the date it is due.

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(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.
If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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, 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

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

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

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

## SECTION C SOURCE OPERATION CONDITIONS

**Entire Source**

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

C.4 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, 46204-2251

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

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

(f) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

**Testing Requirements**

C.5 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source 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.6 Compliance Requirements [326 IAC 2-1.1-11]

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

**Compliance Monitoring Requirements**

C.7 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.

**Record Keeping and Reporting Requirements**

C.8 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.9 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data, reports and support information 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 kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.10 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

(c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) one (1) rubber mixer, identified as #1 Mixer, with a maximum capacity of processing 1,080 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack identified as 929034;

(b) one (1) rubber mixer, identified as #2 Mixer, with a maximum capacity of processing 1,215 pounds of raw material per hour, with two (2) baghouses for particulate matter control, exhausting to two (2) stacks, identified as 909002 and 909003;

(c) one (1) rubber mixer, identified as 35L Moriyama Mixer, with a maximum capacity of processing 225 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as 919005;

(d) one (1) rubber mixer, identified as 55L Rubber Mixer, with a maximum capacity of processing 440 pounds of raw material per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as 959008; and

(e) three (3) rubber extruders, identified as Barwell Rubber Extruders, each with a maximum capacity of processing 700 pounds of rubber per hour, using no control, and exhausting to the atmosphere.

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

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the mixing and extruding operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Based on the above equation, particulate emissions from the mixing and extrusion operations shall be limited as follows:

| Emission Unit | Process Weight Rate (ton/hr) | 326 IAC 6-3-2 Particulate Allowable (lbs/hr) | Uncontrolled Emissions (lb/hr) |
|---|---|---|---|
| #1 Mixer | 0.54 | 2.71 | 0.99 |
| #2 Mixer | 0.61 | 2.94 | 1.12 |
| 35L Moriyama Mixer | 0.11 | 0.93 | 0.21 |
| 55L Rubber Mixer | 0.22 | 1.49 | 0.40 |
| Barwell Rubber Extruders | 0.35 each | 2.03 each | 0.00 |

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

**MINOR SOURCE OPERATING PERMIT**
**ANNUAL NOTIFICATION**

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

| | |
|---|---|
| **Company Name:** | **Freudenberg - NOK General Partnership** |
| **Address:** | **State Road 44 West** |
| **City:** | **Shelbyville, Indiana 46176** |
| **Phone #:** | **317-392-2571** |
| **MSOP #:** | **145-14928-00027** |

I hereby certify that Freudenberg - NOK General Partnership is
still in operation.
no longer in operation.

I hereby certify that Freudenberg - NOK General Partnership is
in compliance with the requirements of MSOP 145-14928-00027.
not in compliance with the requirements of MSOP 145-14928-00027.

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

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

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

# MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: Freudenberg - NOK General Partnership PHONE NO. (317)392-2571
LOCATION: Shelbyville, Shelby County
PERMIT NO. 145-14928 AFS PLANT ID: 145-00027 AFS POINT ID: _____ INSP: D.J. Knots

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

_____

_____

**Company Name:** **Freudenberg - NOK General Partnership**
**Address:** **State Road 44 West, Shelbyville, Indiana**
**Notice Only:** **145-23322**
**Plant ID:** **145-00027**
**Reviewer:** **Linda Quigley/EVP**
**Date Received:** **July 26, 2006**

| | | | |
|---|---|---|---|
| Two (2) Presses | each @ | 7.1 | lb/hr capacity |
| Two (2) Presses | each @ | 7.1 | lb/hr capacity |
| Rubber Processing Capacity | | 28.4 | lb/hr |

| **Pollutant** | **Emission Factor lb/lb** | **Hourly Emissions lb/hr** | **Potential Emissions tons/yr** |
|---|---|---|---|
| 1,1,1 Trichloroethane | 4.29E-06 | 5.68E-06 | 2.49E-05 |
| 1,2,4 Trichlorobenzene | 2.00E-07 | 2.13E-04 | 9.33E-04 |
| 1,3 Butadiene | 7.50E-06 | 2.61E-04 | 1.14E-03 |
| 1,4 Dichlorobenzene | 9.20E-06 | 8.52E-05 | 3.73E-04 |
| Methyl Ethyl Ketone | 3.00E-06 | 6.53E-06 | 2.86E-05 |
| 2,4 Toluene Diamine | 2.30E-07 | 8.80E-05 | 3.86E-04 |
| Methyl Isobutyl Ketone | 3.10E-06 | 2.16E-04 | 9.45E-04 |
| Acetaldehyde | 7.60E-06 | 1.73E-04 | 7.59E-04 |
| Acetonitrile | 6.10E-06 | 1.62E-03 | 7.10E-03 |
| Acetophenone | 5.71E-05 | 1.73E-04 | 7.59E-04 |
| Acrylonitrile | 6.10E-06 | 4.26E-06 | 1.87E-05 |
| Aniline | 1.50E-07 | 3.41E-05 | 1.49E-04 |
| Benzene | 1.20E-06 | 2.27E-05 | 9.95E-05 |
| Benzidene | 8.00E-07 | 2.56E-05 | 1.12E-04 |
| Biphenyl | 9.00E-07 | 7.38E-05 | 3.23E-04 |
| Bis (2-ethylhexl) Phthalate | 2.60E-06 | 1.19E-04 | 5.22E-04 |
| Carbon Disulfide | 4.20E-06 | 1.08E-04 | 4.73E-04 |
| Carbonyl Sulfide | 3.80E-06 | 8.80E-05 | 3.86E-04 |
| Chloroethane | 3.10E-06 | 7.95E-05 | 3.48E-04 |
| Cumene | 2.80E-06 | 2.56E-05 | 1.12E-04 |
| Dibenzofuran | 9.00E-07 | 1.99E-05 | 8.71E-05 |
| Dimethyl Phthalate | 7.00E-07 | 2.04E-04 | 8.96E-04 |
| Dibutylphthalate | 7.20E-06 | 3.12E-05 | 1.37E-04 |
| Ethylbenzene | 1.10E-06 | 1.11E-05 | 4.85E-05 |
| Hexachlorobutadiene | 3.90E-07 | 1.42E-06 | 6.22E-06 |
| Dichloromethane | 5.00E-08 | 4.54E-05 | 1.99E-04 |
| Xylene | 1.60E-06 | 1.14E-04 | 4.98E-04 |
| Napthalene | 4.00E-06 | 4.66E-04 | 2.04E-03 |
| Hexane | 1.64E-05 | 4.26E-06 | 1.87E-05 |
| o-Toluidine | 1.50E-07 | 4.83E-05 | 2.11E-04 |
| o-Xylene | 1.70E-06 | 3.69E-05 | 1.62E-04 |
| Phenol | 1.30E-06 | 1.73E-04 | 7.59E-04 |
| Propylene Oxide | 6.10E-06 | 8.80E-05 | 3.86E-04 |
| Tetrachloroethylene | 3.10E-06 | 7.67E-05 | 3.36E-04 |
| Toluene | 2.70E-06 | 0.00E+00 | 0.00E+00 |
| **Total** | | | **8.40E-01** |

Methodology
Emission factors taken from a study completed for the Rubber Manufacturers Association (RMA), 9/96;
Potential emissions in tons per year = maximum production rate (lbs/yr) * e.f. (lb/lb)/2000

**Appendix A: Emission Calculations**
**VOC from presses**

**Company Name:** **Freudenberg - NOK General Partnership**
**Address:** **State Road 44 West, Shelbyville, Indiana**
**Notice Only:** **145-23322**
**Plant ID:** **145-00027**
**Reviewer:** **Linda Quigley/EVP**
**Date Received:** **July 26, 2006**

| Unit Description | Number of Units | Max. Capacity lb/hr | PM Emission Factor lb/lb | VOC Emission Factor lb/lb | Potential Emissons PM lb/hr | Uncontrolled Potential Emissons PM ton/yr | Controlled Potential Emissions PM ton/yr | Control Efficiency % | Potential Emissions VOC lb/hr | Potential Emissions VOC ton/yr |
|---|---|---|---|---|---|---|---|---|---|---|
| PT-60 | 2 | 7.1 | n/a | 0.00668 | n/a | n/a | n/a | n/a | 0.09 | 0.42 |
| PT-90 | 2 | 7.1 | n/a | 0.00668 | n/a | n/a | n/a | n/a | 0.09 | 0.42 |
| Total | | | | | | | | | 0.19 | 0.83 |

Methodology
Emission factors mixers, extruders and presses taken from the study completed for the Rubber Manufacturers Association (RMA), 9/96;
Emission Factors for Plastic Injection/Blow Mold Presses taken from a study conducted for the State of Wisconsin.
Potential emissions in tons per year = maximum production rate (lbs/yr) * e.f. (lb/lb)/2000