



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: December 22, 2006
RE: Nishikawa Standard Company / 087-23608-00031
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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December 22, 2006

Mr. Michael Hough
Nishikawa Standard Company
324 Morrow Street
Topeka, IN 46571

Re: No.: 087-23608-00031
Significant Permit Modification to:
Part 70 Permit No.: T087-21424-00031

Dear Mr. Hough:

Nishikawa Standard Company was issued Part 70 Operating Permit T087-21424-00031 on April 17, 2006 for an extruded rubber seals manufacturing source. A letter requesting changes to this permit was received on August 14, 2006. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

This modification consists of addition of a VOC emissions limit for surface coating operations and extrusion operations to render the requirements of 326 IAC 2-2 (PSD) not applicable. Surface coating line X025 was also removed from the permit because it has been decommissioned from the source.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages 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 Tanya White c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (973) 575-2555, ext. 3276, or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

Significant Permit Modification No.: 087-23608-00031
Technical Support Document

TW/EVP

cc: File – LaGrange County
LaGrange County Health Department
Northern Regional Office
Air Compliance Section Inspector: Paul Karkiewicz
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Compliance Data Section
Administrative and Development



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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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T087-21424-00031	
Issued by: Paul Dubenetzky Acting Assistant Commissioner Office of Air Quality	Issuance Date: April 7, 2006 Expiration Date: April 7, 2011

First Significant Permit Modification No.: 087-23608-00031	Affected Pages: Entire Permit
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 22, 2006 Expiration Date: April 7, 2011

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(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) 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.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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.

- (f) 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.
- (g) 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.
- (h) 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.
- (i) 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.
- (j) 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.
- (k) 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.
- (l) 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.
- (m) 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.
- (n) 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.
- (o) 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.
- (p) 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.
- (q) 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.
- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
 - (1) One (1) continuous surface coating operation, identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and
 - (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners is scheduled to begin in December 2006.
- (s) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
 - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is scheduled to begin in December 2006;
 - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is scheduled to begin in December 2006; and
 - (3) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.
- (t) 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.

- (u) 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.
- (v) 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.
- (w) 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.
- (x) 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.
- (y) 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.
- (z) 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.
- (aa) 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.
- (bb) 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.

- (cc) 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.
- (dd) 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.
- (ee) 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.
- (ff) 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.
- (gg) 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.

- (hh) 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.
- (ii) 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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) 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.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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.
- (g) 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.
- (h) 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.
- (i) 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.
- (j) 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.
- (k) 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.

- (l) 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.
- (m) 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.
- (n) 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.
- (o) 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.
- (p) 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.
- (q) 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.
- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
 - (1) One (1) continuous surface coating operation, identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and

- (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners is scheduled to begin in December 2006.
- (s) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
 - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is scheduled to begin in December 2006;
 - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is scheduled to begin in December 2006; and
 - (3) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.

(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]

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 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.
- (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 Volatile Organic Compound Limitation [326 IAC 2-2]

The total VOC usage at the 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, two (2) spray lines (X-039 and X-040), the L-Coat Glassline spray booth and L-Coat Extrusion Line (four plastic extruders and three rubber extruders), shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. Emissions from these surface coating operations in combination with uncontrolled potential VOC emissions of 96.47 tons per year from extruding and curing operations (except the L-Coat Extrusion Line), 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.21 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year.

Compliance with this limit shall render the requirements of 326 IAC 2-2 (PSD) 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 surface coating facilities and all control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC 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 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 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 Conditions D.1.1 and 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 VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

- (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) 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)]:

- (t) 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.
- (u) 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.
- (v) 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.
- (w) 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.
- (x) One (1) CV extrusion line (CV line 5), identified as emission unit X009, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusts 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.
- (y) One (1) CV extrusion line (CV line 6), identified as emission unit X010, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusts 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.
- (z) 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.
- (aa) 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.

- (bb) 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.
- (cc) 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.
- (dd) 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.
- (ee) 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.
- (ff) 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.
- (gg) 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.
- (hh) 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)]:

- (ii) 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:

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

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)
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:

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

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: 317-233-0178
Fax: 317-233-6865**

**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

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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: 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, the two (2) spray lines (X-039 and X-040), the L-Coat Glassline Spray Booth, and the extrusion line (four plastic extruders and three rubber extruders) described in permit Section D.1.1.

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 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: _____

Page 1 of 2

<p>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".</p>	
<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 Minor Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Nishikawa Standard Company
Source Location:	324 Morrow Street, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3061
Operation Permit No.:	T087-21424-00031
Operation Permit Issuance Date:	April 17, 2006
Minor Source Modification No.:	087-23516-00031
Significant Permit Modification No.:	087-23608-00031
Permit Reviewer:	Tanya White/EVP

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

Existing Approvals

The source was issued Part 70 Operating Permit No. T087-21424-00031 on April 17, 2006.

There have been no approvals issued to this source since Part 70 Operating Permit No. T087-21424-00031 was issued.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.
- (b) 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 and NO_x emissions 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.

- (c) 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 PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM2.5 emissions.
- (d) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other regulated 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits, and after removing emissions from the decommissioned surface coating line, identified as X025:

Pollutant	Emissions (tons/year)
PM	75.91
PM10	76.90
SO ₂	0.10
VOC	Less than 250
CO	14.69
NO _x	17.49

- (a) This existing source is a minor stationary source, under PSD (326 IAC 2-2), because VOC emissions are limited to less than 250 tons per year and all other regulated pollutants are emitted at a rate of less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the calculated emissions for Part 70 Operating Permit No. T087-21424-00031.

The table below summarizes the potential to emit of HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Xylene	Greater than 10
Hexane	Greater than 10
Total HAPs	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

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)
PM2.5	3.0
PM-10	3.0
SO ₂	0.0
VOC	33.0
CO	1.0
NO _x	3.0
HAPs	Not reported

Description of the New Source Construction

The Office of Air Quality (OAQ) has reviewed a minor source modification application and significant permit modification letter, submitted by Nishikawa Standard Company on August 14, 2006, relating to the construction of an extrusion line consisting of three (3) rubber extruders, four (4) plastic extruders, and four (4) natural gas-fired burners and the construction of a continuous rubber surface coating line consisting of one (1) surface coating operation (with 14 HVLP spray guns), and six (6) natural gas-fired burners. These emission units are scheduled to be installed in December 2006. The proposed modification includes rubber extruding, surface coating, heat treating, electrical treating, and water baths. The process will contribute emissions of VOCs, HAPs, and PM/PM-10 from the extrusion and surface coating operations. Emissions of other regulated pollutants (i.e. SO₂, NO_x, and CO) will be emitted from the combustion sources during the heat treating process. Dry filters will be used to control PM/PM-10 emissions from the spray coating operation. The new emissions units that are being added to the permit through this modification are as follows:

- (a) Continuous Rubber Surface Coating Line consisting of the following emission units:
 - (1) One (1) continuous surface coating operation, identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and
 - (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners is scheduled to begin in December 2006.
- (b) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
 - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is scheduled to begin in December 2006;
 - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is scheduled to begin in December 2006; and
 - (3) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.

The source has also asked to remove the surface coating line identified as X025 from the permit because it has been decommissioned. The potential emissions of VOC, PM, PM-10, SO₂, NO_x, CO, and HAPs for the source were reduced as a result of removing this surface coating line, which included emissions from one (1) preheat oven (1.5 MMBtu/hr), one (1) curing oven (2.0 MMBtu/hr), and the one (1) make-up air heater (1.5 MMBtu/hr).

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
LCEL-S01	Natural Gas Burner	10 (Above Roof)	1.5	2200	100
LCEL-S02	Natural Gas Burner	10 (Above Roof)	1.5	2200	100
LCEL-S03	Natural Gas Burner	10 (Above Roof)	1.5	2200	100
LCEL-S04	Natural Gas Burner	10 (Above Roof)	1.5	2200	100
LCSB-S01	Surface Coating Operations	10 (Above Roof)	1.67	2000	Ambient
LCSC-S01 through LCSB-S01	Six Natural Gas Burners	10 (Above Roof)	1.5	2000	100

Emission Calculations

See Appendix A of this document for detailed emission calculations. (See pages 1 through 6)

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls due to the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	15.86
PM10	15.95
SO ₂	0.01
VOC	21.05
CO	1.34
NO _x	1.60

HAPs	Potential To Emit (tons/year)
Hexane	Less than 10
Ethylene Glycol	Less than 10
Total HAPs	Less than 25

This source modification is subject to 326 IAC 2-7-10.5(d)(3), because the uncontrolled potential emissions of PM, PM-10 and VOCs from the proposed emissions units are each less than twenty-five (25) tons per year but greater than five (5) tons per year, and shall be processed in accordance with 326 IAC 2-7-10.5(e). Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(b), because every significant change in existing Part 70 Permit terms/conditions and every relaxation of reporting or record keeping permit terms/conditions shall be considered significant. This modification includes revisions to the VOC emission limit for surface coating operations to render the requirements of 326 IAC 2-2 (PSD) not applicable.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units due to the modification. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						Total HAP
	PM	PM10	SO ₂	VOC	CO	NO _x	
LCEL-01 through LCEL-04 (Four Natural Gas Burners) and LCSC-01 through LCSC-06 (Six Natural Gas Burners)	0.03	0.12	0.01	0.09	1.34	1.60	0.03
L-Coat Glassline Spray Booth	15.83	15.83	0.00	17.86	0.00	0.00	0.44
Rubber Extruders	0.00	0.00	0.00	2.94	0.00	0.00	0.44
Plastic Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.03
Total for Modification	15.86	15.95	0.01	21.05	1.34	1.60	0.50
PSD Major Source Threshold	250	250	250	250	250	250	N/A

This modification to an existing PSD minor stationary source is not major because the source emissions are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) 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 ranges, ovens, microwave ovens, refrigerators, freezers, washers, dryers, dishwashers, water heaters, or trash compactors 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 surface coating line, which is scheduled to be installed in December 2006, is not a large appliance surface coating line and hence the requirements of 40 CFR 60.450, Subpart SS are not included in this proposed modification.
- (b) 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 proposed modification for the surface coating line 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.
- (c) 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 modification for the surface coating line since the source does not have any onsite coating operations and coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates.
- (d) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (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 for the proposed surface coating line 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 ten (10) natural gas-fired burners at the source because 40 CFR 63, Subpart DDDDD is applicable only to boilers and process heaters. Therefore, the requirements 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A are not included in the permit modification for these burners.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) are not included in this proposed modification.
- (h) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used (Y/N)	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
LCEL-01 through LCEL-04 (Four Natural Gas Burners) and LCSC-01 through LCSC-06 (Six Natural Gas Burners)	N	N	<100	<100	100	N	N
L-Coat Glassline Spray Booth	Y (dry filters for PM control)	Y (for PM)	<100	<100	100	N	N
Rubber Extruders	N	N	<100	<100	100	N	N
Plastic Extruders	N	N	<100	<100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this proposed modification.

State Rule Applicability Determination

326 IAC 2-2 (Prevention of Significant Deterioration)

PSD applicability is discussed under the Permit Level Determination - PSD section.

This source, which is not one of the 28 listed source categories, is an existing minor stationary source because prior to this modification, the potential to emit of the source based on allowable emission limits in the Part 70 Permit was less than the PSD major source threshold of 250 tons per year for VOCs. The unrestricted potential emissions of all other regulated pollutants are less than 250 tons per year.

In this proposed modification, the source has requested to add new emission units that will emit VOCs. Permit Condition D.1.1 has an existing PSD minor limit for VOCs; however since this limit was a part of the 326 IAC 8-1-6 (BACT) determination, this limit was not revised. As such, a PSD minor limit for VOCs was added to permit Condition D.1.2, for surface coating operations and the proposed extrusion line, to ensure that the source-wide emissions of VOCs continue to be limited below 250 tons per year in order to preclude applicability of 326 IAC 2-2 (PSD). Surface coating line X025 is also being removed from the permit because it has been decommissioned. Therefore, this modification, to an existing minor source, will be a minor modification under PSD. Since the restricted emissions of VOC are less than 250 tons per year and the unrestricted potential to emit of all other pollutants is less than 250 tons per year, each, this modification is not subject to the requirements of 326 IAC 2-2 (PSD). The source will remain a minor source under PSD after this modification.

The table below summarizes the potential to emit, reflecting all limits, of the new and existing emission units at the source after the modification.

Process/facility	Potential to Emit (tons/year)						Single HAP/ Combined HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Spray coating lines and proposed extrusion line ⁽¹⁾	56.70	56.70	0.0	148 ⁽⁴⁾	0.0	0.0	> 10 & > 25
Extruding and curing ⁽²⁾	34.92	34.92	0.0	96.47	0.0	0.0	> 10 & > 25
Mixing and milling	1.69	1.69	0.0	1.90	0.0	0.0	< 10 & < 25
Combustion devices ⁽³⁾	0.33	1.33	0.1	1.21	14.69	17.49	< 10 & < 25
Insignificant Activities	Neg.	Neg.	0.0	2.0	0.0	0.0	< 10 & < 25
Total Emissions	91.98	93.06	0.11	< 250	16.03	19.09	> 10 & > 25

Notes:

- (1) Includes the 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), two (2) spray lines (X039 and X040), one (1) L-Coat Glassline Spray Booth, and the L-Coat Extrusion Line rubber and plastic extruders.
- (2) Potential uncontrolled emissions include 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). These emissions do not include the L-Coat Extrusion Line rubber and plastic extruders.
- (3) Potential uncontrolled emissions include 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), five (5) coating cure ovens (0.34 MMBtu/hr each), two (2) coating cure ovens (0.25 MMBtu/hr each), four (4) hot air rubber curing ovens (0.4 MMBtu/hr each), and the four (4) burners (LCEL-01-LCEL-04) (0.782 MMBtu/hr each) and the six (6) burners (LCSC-01 through LCSC-06) (0.086 MMBtu/hr each). All combustion devices fire natural gas.
- (4) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the VOC delivered to spray coating lines (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, the two (2) spray lines (X-039 and X-040), the L-Coat Glassline Spray Booth and the L-Coat Extrusion Line rubber and plastic extruders), is limited to less than 148 tons per year.

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 or more of any single HAP or 25 tons per year or more of combined HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

In this proposed modification the source has requested to add new equipment that will emit emissions of HAPs. The potential to emit (PTE) for each new emission unit (or process) is less than 10 tons per year of any single HAP and less than 25 tons per year of combined HAPs. Therefore, the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) are not included in this proposed modification.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The ten (10) natural gas-fired burners are not subject to the sulfur dioxide limitations of 326 IAC 7-1.1-2 because the proposed emission units each have a potential to emit of sulfur dioxide less than twenty-five (25) tons per year or less than ten (10) pounds per hour.

There are no other state rules that are applicable to this source, as a result of this proposed modification.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2 (d), particulate from the L-Coat Glassline Spray Booth shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(b)(14), the ten (10) natural gas-fired burners are not subject to the requirements of 326 IAC 6-3-2, because potential emissions of particulate are less than 0.551 pounds per hour for each emission unit. Therefore, the requirements of 326 IAC 6-3-2 are not included in this proposed modification for the burners.
- (c) Pursuant to 326 IAC 6-3-2(b)(14), the three (3) rubber extruders and the four (4) plastic extruders are not subject to the requirements of 326 IAC 6-3-2, because the potential emissions of particulate are less than 0.551 pounds per hour for each emission unit. Therefore, the requirements of 326 IAC 6-3-2 are not included in this proposed modification for the rubber and plastic extruders.

326 IAC 8-2 (Surface Coating Emission Limitations)

The requirements of 326 IAC 8-2 are not applicable to the L-Coat Glassline Spray Booth, because the surface coating operations performed in the L-Coat Glassline Spray Booth involve the coating of rubber or plastic parts and the operations do not involve surface coating of any of the materials that are listed in 326 IAC 8-2-2 through 326 IAC 8-2-13.

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

The requirements of 326 IAC 8-1-6 are not applicable to the proposed surface coating line and the proposed extrusion line because the uncontrolled potential emissions of VOCs from each facility is less than 25 tons per year.

There are no other state rules that are applicable to any facility at this source, as a result of this proposed modification.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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.

The Compliance Determination Requirements applicable to this modification are as follows:

There are no monitoring conditions specifically applicable to any facility at this source, as a result of this proposed modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T087-21424-00031. Deleted language appears as ~~strike-throughs~~ and new language appears in **bold**:

- (1) Reason: Permit condition A.2 has been revised to include the new surface coating line and extrusion line and surface coating line X025 has been removed from the permit because the emission unit has been decommissioned.

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.~~
- (ba)** 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.
- (eb)** 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.
- (dc)** 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.
- (ed)** 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.

- (fe) 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.
- (gf) 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.
- (hg) 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.
- (ih) 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.
- (ji) 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.
- (kj) 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.
- (lk) 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.
- (ml) 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.
- (nm) 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.
- (on) 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.
- (po) 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.
- (ep) 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.
- (fq) 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.
- (r) **Continuous Rubber Surface Coating Line consisting of the following emission units:**
- (1) **One (1) continuous surface coating operation, identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and**
 - (2) **Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners is scheduled to begin in December 2006.**
- (s) **Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:**
- (1) **Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is scheduled to begin in December 2006;**
 - (2) **Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is scheduled to begin in December 2006; and**
 - (3) **Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.**

- (2) Reason: The phone and fax numbers for IDEM, OAQ's Compliance Section have been updated.

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: 317-233-56740178(ask for Compliance Section)
Facsimile Number: 317-233-59676865

...

- (3) Reason: The facility description in permit Section D.1 has been revised to include the new surface coating and extrusion line and to remove surface coating line X025 because it has been decommissioned from the source.

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.~~
- (ba) 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.

- (eb) 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.
- (ec) 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.
- (ed) 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.
- (fe) 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.
- (gf) 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.
- (hg) 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.
- (ih) 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.
- (ji) 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.
- (kj) 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.
- (kk) 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.
- (kl) 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.
- (am) 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.

(en) 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.

(po) 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.

(ep) 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.

(fq) 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.

(r) **Continuous Rubber Surface Coating Line consisting of the following emission units:**

- (1) **One (1) continuous surface coating operation, identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and**
- (2) **Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners is scheduled to begin in December 2006.**

(s) **Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:**

- (1) **Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is scheduled to begin in December 2006;**

- (2) **Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is scheduled to begin in December 2006; and**
- (3) **Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.**

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

- (4) Reason: Surface coating line X025 was removed from Condition D.1.1 because it has been decommissioned from the source. Also, emissions from equipment other than the surface coating operations were not incorporated into the condition because these emission units are not subject to 326 IAC 8-1-6 (BACT) and are not relevant to the BACT determination.

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.
- (5) Reason: Compliance determination requirements for surface coating line X025 are no longer required because it has been decommissioned from the source. As such Condition D.1.2 is removed from the permit.

~~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.~~

- (6) Reason: A PSD minor limit for VOC emissions was added in permit Condition D.1.2 to ensure that source-wide emissions of VOCs are limited to less than 250 tons in order to preclude applicability of 326 IAC 2-2 (PSD).

D.1.2 Volatile Organic Compound Limitation [326 IAC 2-2]

The total VOC usage at the 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, two (2) spray lines (X-039 and X-040), the L-Coat Glassline spray booth and L-Coat Extrusion Line (four plastic extruders and three rubber extruders), shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. Emissions from these surface coating operations in combination with uncontrolled potential VOC emissions of 96.47 tons per year from extruding and curing operations (except the L-Coat Extrusion Line), 1.90 tons per year from mixing and milling, 2.0 tons per year from insignificant activities and 1.21 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year.

Compliance with this limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (7) Reason: Compliance determination requirements for surface coating line X025 are no longer required because it has been decommissioned from the source; however there are applicable compliance determination requirements for the new Condition D.1.2. References to the HAP limitations in former Condition D.1.2 have been removed from this condition.

~~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.~~

- (8) Reason: Compliance determination requirements for surface coating line X025 are no longer required because it has been decommissioned from the source; however there are applicable compliance determination requirements for the new Condition D.1.2. References to the HAP limitations in former Condition D.1.2 have been removed from this condition.

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.

- (9) Reason: Record keeping requirements for surface coating line X025 are no longer required because it has been decommissioned from the source; however there are applicable record keeping requirements for the new Condition D.1.2. As such, this condition has been revised.

D.1.7 Record Keeping Requirements

(a) To document compliance with ~~Condition~~ **Conditions D.1.1 and 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 VOC usage limits and the VOC emission limits established in ~~Condition~~ **Conditions D.1.1 and D.1.2**.

- (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.~~

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

(10) Reason: The phone and fax numbers for IDEM, OAQ's Compliance Branch have been updated on the Emergency Occurrence Report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~567~~**40178**
Fax: 317-233-~~5967~~**6865**

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 317-233-56740178, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-59676865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

...

(11) Reason: The Part 70 Quarterly Report form has been revised to remove the surface coating line X025 and the proposed surface coating and extrusion lines have been added.

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~~ **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)~~ **the L-Coat Glassline Spray Booth, and the extrusion line (four plastic extruders and three rubber extruders) described in permit Section D.1.1.**
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.

...

(12) Reason: The Part 70 Quarterly Report forms for X025 have been removed from the permit because surface coating line X025 has been decommissioned from the source.

**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 46574 _____
 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 46574 _____
 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.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 087-23516-00031 and Significant Permit Modification No. 087-23608-00031. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

Appendix A: Emission Calculations

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
MSM/SPM No.: 087-23516-00031/087-23608-00031
Plt ID: 087-00031
Reviewer: TW/EVP
Date: Sep-06

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Combustion	Rubber Parts Manufacturing (including extrusion lines)	TOTAL
PM	15.83	0.03	0.00	15.86
PM10	15.83	0.12	0.00	15.95
SO2	0.00	0.01	0.00	0.01
NOx	0.00	1.60	0.00	1.60
VOC	17.86	0.09	3.10	21.05
CO	0.00	1.34	0.00	1.34
total HAPs	0.44	0.03	0.47	0.94
worst case single HAP	0.44	0.03	0.38	0.44
	Ethylene Glycol	Hexane	Hexane	Ethylene Glycol
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	15.83	0.03	0.00	15.86
PM10	15.83	0.12	0.00	15.95
SO2	0.00	0.01	0.00	0.01
NOx	0.00	1.60	0.00	1.60
VOC	17.86	0.09	3.10	21.05
CO	0.00	1.34	0.00	1.34
total HAPs	0.44	0.03	0.47	0.94
worst case single HAP	0.44	0.03	0.38	0.44
	Ethylene Glycol	Hexane	Hexane	Ethylene Glycol
Total emissions based on rated capacity at 8,760 hours/year, after control.				

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
MSM/SPM No.: 087-23516-00031/087-23608-00031
Pit ID: 087-00031
Reviewer: TW/EVP
Date: Sep-06

Heat Input Capacity⁽¹⁾
MMBtu/hr

Potential Throughput
MMCF/yr

3.64

31.92

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.03	0.12	0.01	1.60	0.09	1.34

*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:

Four (4) natural gas burners (0.782 MMBtu/hr each)

Six (6) natural gas burners (0.086 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 next page for HAP emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAP Emissions

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
MSM/SPM No.: 087-23516-00031/087-23608-00031
Pit ID: 087-00031
Reviewer: TW/EVP
Date: Sep-06

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	3.35E-05	1.92E-05	1.20E-03	2.87E-02	5.43E-05

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	7.98E-06	1.76E-05	2.23E-05	6.07E-06	3.35E-05

Methodology is the same as previous page.

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

HAP Emission Calculations

Company Name: Nishikawa Standard Company
 Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
 MSM/SPM No.: 087-23516-00031/087-23608-00031
 Plt ID: 087-00031
 Reviewer: TW/EVP
 Date: Sep-06

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Emission Factor	Weight % Ethylene Glycol	Ethylene Glycol Emissions (ton/yr)
F-UWG-HS/EMRALON 8370APA-HS*	9.20	2.01	1.00	N/A	5.00%	0.44

Worst-case Potential Emissions (tons/yr) = **0.44**

Total HAPs (tons per year) **0.44**

METHODOLOGY

HAP 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.
 *Worst-case HAP emissions for surface coating operations

**Appendix A: Emission Calculations
Extrusion Lines**

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
MSM/SPM No.: 087-23516-00031/087-23608-00031
Pit ID: 087-00031
Reviewer: TW/EVP
Date: Sep-06

Emission Unit	No. of Units	Throughput (lb/hr)	VOC Emission Factor (lb VOC/lb product)	PM/PM-10 Emission Factor (lb PM or PM-10/lb product)	Total HAP Emission Factor (lb HAP/lb product)	Worst-case HAP Emission Factor (lb HAP/lb product)	VOC Emissions (ton/yr)	PM/PM-10 Emissions (ton/yr)	Total HAP Emissions (ton/yr)	Worst-case HAP Emissions (ton/yr)
Rubber Extruder	3	447	5.00E-04	1.12E-07	7.52E-05	6.05E-05	2.94	0.00	0.44	0.36
Plastic Extruder	4	19	5.00E-04	1.12E-07	7.52E-05	6.05E-05	0.17	0.00	0.03	0.02

Note:

Emission factors from Table 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 polyurethane plastic processing facilities

Emission factors are for worst-case compound for each pollutant.

Methodology

Emissions (tons/yr) = # Units * Throughput (lb/hr) * Emission Factor (lb/lb product) * 8,760 (hrs/yr) * 1/2000 (lbs/ton)