



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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Indianapolis, Indiana 46204  
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TO: Interested Parties / Applicant  
DATE: December 29, 2006  
RE: Vibracoustics North America / 113-23616-00023  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Vibracoustic North America  
1497 Gerber Street  
Ligonier, Indiana 46767**

(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. 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.**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F113-23616-00023	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2006  Expiration Date: December 29, 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 2-8-3(b)]

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The Permittee owns and operates a stationary rubber product manufacturing process.

Authorized Individual:	Site Executive Officer
Source Address:	1497 Gerber Street, Ligonier, IN 46767
Mailing Address:	1497 Gerber Street, Ligonier, IN 46767
General Source Phone Number:	(260) 894-7183
SIC Code:	3061
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Chain-on-Edge coater, identified as COE #2, constructed in 1991, with a maximum capacity of 800 metal parts per hour, utilizing air atomization as the method of application, equipped with dry filters for particulate control, and exhausting at two (2) stacks EO1 and EO2; and
- (b) One (1) Chain-on-Edge-Coater, identified as Sprimag #2, constructed in December 1999, with a maximum capacity of 5,000 metal parts per hour, utilizing high volume low pressure (HVLP) spray application system, equipped with dry filters for particulate control, and exhausting to stack Sprimag #2.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour; including:
  - (1) One (1) Jenfab Washer/Phosphater with a maximum heat input rate of 1 MMBtu per hour;
  - (2) Four (4) space heaters, with a total heat input rate of 0.8 MMBtu per hour;
  - (3) Eight (8) heaters, with a total heat input rate of 10.97 MMBtu per hour; and
  - (4) One (1) furnace containing a 0.2 MMBtu/hr natural gas fired burner.

- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) Safety Kleen Model 81. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) Forced and induced draft noncontact cooling tower system not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Heat exchanger cleaning and repair.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) On-site fire and emergency response training approved by the department.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including the following:  
[326 IAC 6-3-2]
  - (1) One (1) metal casing gritblaster, identified as BL1 (Bronco I Blaster - West Ring Blaster), utilizing steel shot blast media, with a maximum throughput capacity of 180 pounds per hour, with particulate emissions controlled by dust a collector which exhausts inside the building;
  - (2) One (1) metal casing gritblaster, identified as BL2 (Wheelabrator Blaster - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building;
  - (3) One (1) metal casing gritblaster, identified BL3 (Bronco II Tumblast Unit - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building; and
  - (4) One (1) mold cleaning gritblaster, identified as BL4 (Maxiblast Mold Cleaning Blaster), utilizing plastic bead blast media, with a maximum throughput capacity of 1,000 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building.
- (k) Filter or coalescer media changeout.
- (l) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

- (n) Four (4) final coat spray booths which apply water-based coatings to engine mounts while the part rotates. Each booth uses high volume low pressure (HVLP) spray application and has a single spindle and processes a single part at a time. Particulate emissions are controlled by dry filters. [326 IAC 2-8-4]
- (o) Any unit emitting less than 3 lbs/hr and 15 lbs/day of VOCs, 5 lbs/day and 1 ton per year of any single HAP, 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, 5 lbs/hr and 25 lbs/day of PM/PM-10, including:
  - (1) One (1) Double Stack Transfer Press, identified as #0, with a maximum throughput rate of 0.88 pounds per hour; [326 IAC 2-8-4]
  - (2) Eleven (11) French Oil Transfer Presses, identified as Nos. 1 - 11, each with a maximum throughput rate of 12.87 pounds rubber per hour; [326 IAC 2-8-4]
  - (3) Two (2) French Oil Injection Presses, identified as F26 and F29, each with a maximum throughput rate of 41.76 pounds rubber per hour; [326 IAC 2-8-4]
  - (4) Nine (9) Wabash Transfer Presses, identified as W1 - W6 and H7 - H9, each with a maximum throughput rate of 2.09 pounds rubber per hour; [326 IAC 2-8-4]
  - (5) Eleven (11) Desma Injection Presses, identified as D1 - D8 and D10 - D12; each with a maximum throughput rate of 60 pounds rubber per hour; [326 IAC 2-8-4]
  - (6) Twenty (20) REP Presses, identified as 1 -3, 5, 7 -22, with a total maximum throughput rate of 757 pounds rubber per hour; [326 IAC 2-8-4]
  - (7) Seven (7) LWB Steinel Injection Presses, identified as 1 and 3 - 8, each with a maximum throughput rate of 48.75 pounds rubber per hour; [326 IAC 2-8-4]
  - (8) Six (6) electric post cure ovens, identified as GR0 (previously Big Blue), GR1 (previously PC02), GR2 (previously PC03), GR3 (previously PC04), GR4 and GR5, each with a maximum throughput rate of 28.5 pounds rubber per hour; [326 IAC 6-3-2]
  - (9) One (1) Barwell rubber extruder with a maximum throughput rate of 187.5 pounds rubber per hour; [326 IAC 6-3-2]
  - (10) One (1) 80-inch rubber warm up mill with a maximum throughput rate of 300 pounds rubber per hour; and
  - (11) One (1) Wabash Assembly Press, identified as W44, with an enclosed bath used to fill wet motor mounts with glycol solution.

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

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

## **SECTION B GENERAL CONDITIONS**

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

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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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, F113-23616-00023, 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, until the renewal permit has been issued or denied.

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

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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 2-8-6]**

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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 2-8-4(4)]**

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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 2-8-4(5)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "Authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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, and Northern Regional Office 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

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

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

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

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

- (a) All terms and conditions of permits established prior to F113-23616-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

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

**B.14** Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

**B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.16** Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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

Request for renewal shall be submitted to:

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

- (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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The

application shall be submitted to:

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

#### C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

continuous opacity monitor) in a six (6) hour period.

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

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

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

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

**C.7 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

---

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

#### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]**

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

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) Chain-on-Edge coater, identified as COE #2, constructed in 1991, with a maximum capacity of 800 metal parts per hour, utilizing air atomization as the method of application, equipped with dry filters for particulate control, and exhausting at two (2) stacks EO1 and EO2; and
- (b) One (1) Chain-on-Edge-Coater, identified as Sprimag #2, constructed in December 1999, with a maximum capacity of 5,000 metal parts per hour, utilizing high volume low pressure (HVLP) spray application system, equipped with dry filters for particulate control, and exhausting to stack Sprimag #2.

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (o) Four (4) final coat spray booths which apply water-based coatings to engine mounts while the part rotates. Each booth uses high volume low pressure (HVLP) spray application and has a single spindle and processes a single part at a time. Particulate emissions are controlled by dry filters. [326 IAC 2-8-4]

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

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-1-6]

The total usage of VOC at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, 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.

Combined with the VOC limit of Condition D.2.1, and the potential to emit of VOC from insignificant activities, the source potential to emit of VOC is limited to less than one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to COE #2 and Sprimag #2; and the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to this source.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR Part 63.2]

The Permittee shall comply as follows:

- (a) Total usage of any single HAP at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, shall be limited to less than five (5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Total usage of the combination of HAPs at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Coating materials applied at COE #2 and Sprimag #2 shall not contain carbon disulfide or aniline.

Combined with the HAPs limit of Condition D.2.2, and the potential to emit of HAPs from insignificant activities, the source potential to emit of single and combined HAPs is limited to less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to this source. Compliance with this condition also shall make this source an area source of HAP emissions, pursuant to 40 CFR 63.2. Therefore, the requirements of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) are not applicable.

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

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Pursuant to Significant Permit Modification No. 113-16663-00023, issued on October 22, 2003, and 326 IAC 6-3-2(d), particulate from the one (1) West Chain-on-Edge coater, COE #2, and one (1) Chain-on-Edge-Coater, Sprimag #2, shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

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

**Compliance Determination Requirements**

**D.1.5 VOCs and HAPs [326 IAC 8-1-2][326 IAC 8-1-4]**

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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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.6 Training Requirements**

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Pursuant to Significant Permit Modification No. 113-16663-00023, issued on October 22, 2003, the Permittee shall implement an operator-training program as follows:

- (a) All spray booth operators or employees that perform maintenance at the facilities listed in the Chain-on-Edge coaters shall be trained in the proper set-up and operation of the particulate control system. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

**D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage and emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and VOC and HAP 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.

- (2) The single and total combined HAP and total VOC usages for each month; and
  - (3) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a copy of the operator-training program, the list of trained operators and training records.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (b) Any unit emitting less than 3 lbs/hr and 15 lbs/day of VOCs, 5 lbs/day and 1 ton per year of any single HAP, 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, 5 lbs/hr and 25 lbs/day of PM/PM-10, including:
- (1) One (1) Double Stack Transfer Press, identified as #0, with a maximum throughput rate of 0.88 pounds per hour; [326 IAC 2-8-4]
  - (2) Eleven (11) French Oil Transfer Presses, identified as Nos. 1 - 11, each with a maximum throughput rate of 12.87 pounds rubber per hour; [326 IAC 2-8-4]
  - (3) Two (2) French Oil Injection Presses, identified as F26 and F29, each with a maximum throughput rate of 41.76 pounds rubber per hour; [326 IAC 2-8-4]
  - (4) Nine (9) Wabash Transfer Presses, identified as W1 - W6 and H7 - H9, each with a maximum throughput rate of 2.09 pounds rubber per hour; [326 IAC 2-8-4]
  - (5) Eleven (11) Desma Injection Presses, identified as D1 - D8 and D10 - D12; each with a maximum throughput rate of 60 pounds rubber per hour; [326 IAC 2-8-4]
  - (6) Twenty (20) REP Presses, identified as 1 -3, 5, 7 -22, with a total maximum throughput rate of 757 pounds rubber per hour; [326 IAC 2-8-4]
  - (7) Seven (7) LWB Steinel Injection Presses, identified as 1 and 3 - 8, each with a maximum throughput rate of 48.75 pounds rubber per hour; [326 IAC 2-8-4]

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [40 CFR Part 63.2]

The total rubber input to all molding presses shall not exceed ten million (10,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions shall be limited to 6.68E-03 lb/lb rubber pressed. These limits are equivalent to 33.42 tons VOC/year. The total HAP emissions shall be limited to 1.36E-03 lb/lb rubber pressed. These limits are equivalent to 6.80 tons total HAPs/year. The carbon disulfide emissions shall be limited to 1.32E-03 lb/lb rubber pressed. These limits are equivalent to 6.61 tons of carbon disulfide/year.

Combined with the VOC limit of Condition D.1.1, and the potential to emit of VOC from insignificant activities, the source potential to emit of VOC is limited to less than one-hundred (100) tons per year. This limitation shall also limit the source emissions of single and combined HAPs to less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to this source. Compliance with this condition also shall make this source an area source of HAP emissions, pursuant to 40 CFR Part 63.2. Therefore, the requirements of 40 CFR Part 63, Subpart M (Miscellaneous Metal Parts and Products Surface Coating NESHAP) are not applicable.

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

#### D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain monthly records of the total amount of rubber input to the rubber molding presses.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.2.3 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS**

<b>Emissions Unit Description: Insignificant Activities</b>	
(j)	Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including the following: [326 IAC 6-3-2]
(1)	One (1) metal casing gritblaster, identified as BL1 (Bronco I Blaster - West Ring Blaster), utilizing steel shot blast media, with a maximum throughput capacity of 180 pounds per hour, with particulate emissions controlled by dust a collector which exhausts inside the building;
(2)	One (1) metal casing gritblaster, identified as BL2 (Wheelabrator Blaster - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building;
(3)	One (1) metal casing gritblaster, identified BL3 (Bronco II Tumblast Unit - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building; and
(4)	One (1) mold cleaning gritblaster, identified as BL4 (Maxiblast Mold Cleaning Blaster), utilizing plastic bead blast media, with a maximum throughput capacity of 1,000 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building.
(o)	Any unit emitting less than 3 lbs/hr and 15 lbs/day of VOCs, 5 lbs/day and 1 ton per year of any single HAP, 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, 5 lbs/hr and 25 lbs/day of PM/PM-10, including:
(8)	Six (6) electric post cure ovens, identified as GR0 (previously Big Blue), GR1 (previously PC02), GR2 (previously PC03), GR3 (previously PC04), GR4 and GR5, each with a maximum throughput rate of 28.5 pounds rubber per hour; [326 IAC 6-3-2];
(9)	One (1) Barwell rubber extruder with a maximum throughput rate of 187.5 pounds rubber per hour; [326 IAC 6-3-2]
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

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

**D.4.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process), the particulate emission rate from the facilities listed below, as insignificant activities, shall be limited as specified when operating at the respective process weight rate:

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
Bronco I Blaster BL1	180	0.82
Wheelabrator Blaster BL2	2,143	4.29
Bronco II Tumblast Unit BL3	2,143	4.29
Mold Cleaning Gritblaster, BL4	1,000	2.58
Rubber Extruding (1 Unit)	188	0.84
Rubber Post-Curing (6 Units)	28.5 (each)	0.551 (each)

The pounds per hour allowable particulate emission rates were calculated with the following equation:

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

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

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## **Compliance Determination Requirements**

### **D.4.2 Particulate Control**

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In order to comply with condition D.4.1, the dust collectors for particulate control shall be in operation and control emissions from the respective gritblasters at all times that these facilities are in operation.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Vibracoustic North America  
Source Address: 1497 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
FESOP No.: F113-23616-00023

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Vibracoustic North America  
Source Address: 1497 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
FESOP No.: F113-23616-00023

**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"><li>• 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</li><li>• 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</li></ul>
---

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Vibracoustic North America  
Source Address: 1497 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
FESOP No.: F113-23616-00023  
Facility: COE #2 and Sprimag #2  
Parameter: VOC usage  
Limit: The total usage of VOC at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, minus solvent shipped out, 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.

YEAR: \_\_\_\_\_

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Vibracoustic North America  
 Source Address: 1497 Gerber Street, Ligonier, IN 46767  
 Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
 FESOP No.: F113-23616-00023  
 Facility: COE #2 and Sprimag #2  
 Parameter: Worst case single HAP and combined HAP usage  
 Limit: (a) Total usage of any single HAP at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, minus solvent shipped out, shall be limited to less than five (5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.  
 (b) Total usage of the combination of HAPs at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, minus solvent shipped out, shall be limited to less than ten (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	
	This Month		Previous 11 Months		12 Month Total	
	Single worst HAP	Combined HAPs	Single worst HAP	Combined HAPs	Single worst HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Vibracoustic North America  
Source Address: 1497 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
FESOP No.: F113-23616-00023  
Facility: 61 Rubber Presses  
Parameter: Total rubber pressed  
Limit: The total rubber input to all molding presses shall not exceed ten million (10,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

Source Name: Vibracoustic North America  
Source Address: 1497 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1497 Gerber Street, Ligonier, IN 46767  
FESOP No.: F113-23616-00023

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 ΔNo 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	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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 Federally Enforceable State Operating Permit  
(FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Vibracoustic North America</b>
<b>Source Location:</b>	<b>1497 Gerber Street, Ligonier, IN 46767</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3061</b>
<b>Operation Permit No.:</b>	<b>T113-7644-00023</b>
<b>Operation Permit Issuance Date:</b>	<b>June 30, 2000</b>
<b>Permit Renewal No.:</b>	<b>F113-23616-00023</b>
<b>Permit Reviewer:</b>	<b>Michael Hirtler/EVP</b>

The Office of Air Quality (OAQ) has reviewed a FESOP application from Vibracoustic North America (VNA), previously known as Freudenberg – NOK General Partnership, relating to the operation of a stationary rubber product manufacturing source.

**History**

Freudenberg – NOK General Partnership was issued Part 70 Operating Permit T113-7644-00023 on June 30, 2000. Freudenberg – NOK General Partnership submitted a Part 70 permit renewal application on September 30, 2004 which included a request to change the name of the source to Vibracoustic North America. Also, the Permittee requested the removal of three existing coating facilities (COE #1, COE #3 and COE#4) from their permit since the facilities have been removed from service; and they requested the removal of the automobile parts production operations located at 1496 Gerber Street, identified as Plant 2 in the initial Part 70 permit, since the operation has been purchased by a separate unrelated company, Vibration Control Technologies (VCT).

In addition to the above, OAQ received a new application on September 6, 2006 from the Permittee that requested the pending renewal be transitioned to, and issued as, a FESOP. The Permittee has requested limits on volatile organic compounds (VOC) and organic hazardous air pollutant (HAP) usage such that the source is limited to less than the corresponding thresholds for Part 70 permit applicability. As such, and pursuant to 326 IAC 2-7-2 (Applicability), the Part 70 requirements no longer apply and this operating permit renewal is being issued as a first-time FESOP pursuant to 326 IAC 2-8-2.

**Source Definition**

The Source Definition from previous Part 70 Operating Permit T113-7644-00023 concluded the following:

This stationary rubber product manufacturing source consists of two (2) plants:

- (a) Plant 1 is located at 1497 Gerber Street, Ligonier, Indiana 46767; and
- (b) Plant 2 is located at 1496 Gerber Street, Ligonier, Indiana 46767.

The two (2) plants were determined to be located on contiguous properties and owned by one (1) company. Further, while the two plants were determined to have different SIC codes, with Plant 2 producing painted automobile parts made from the rubber components manufactured by Plant 1, Plant 2 was determined to provide a support function to Plant 1. As such, IDEM concluded that the two plants should be considered one (1) source under Part 70 Operating Permit T113-7644-00023.

During this permit application review, the Permittee provided new source definition information. IDEM, OAQ has determined that the two plants are no longer part of the same major source. The term "major source" is defined by rule at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the rule's criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

Vibration Control Technologies, LLC (VCT) purchased Plant #2 from Freudenberg (now Vibracoustic North America or VNA), effective January 1, 2002. VCT is a joint venture between Freudenberg NOK General Partnership (FNGP) and TAG Holdings. VCT is 51% owned by TAG Holdings and 49% is owned by FNGP. VNA is a division of Freudenberg NOK General Partnership (FNGP), and as such is wholly owned by FNGP.

VNA manufactures engine mounts for Ford, bushings for Ford and General Motors, and vibration dampers for Ford and Nissan. These parts are created by molding rubber to chemically treated metal. VNA's Standard Industrial Classification (SIC) Code is 3061 for molded, extruded and lathe cut mechanical rubber goods. VNA sells molded components (rubber/metal), molded rubber TVD rings, unconverted metal components, and preformed rubber to VCT. VNA's sales to VCT are 47% of VNA's total annual sales.

VCT further machines, finishes, and assembles the items from VNA to create torsional vibration dampers (TVDs). VCT sells the TVDs to various automotive manufacturers. VNA's Standard Industrial Classification (SIC) Code is 3714 for motor vehicle parts and accessories. VCT does not sell any product or other material to VNA.

IDEM, OAQ finds that the two plants satisfy the first element of the definition of major source. The two plants are under common control. FNGP has a contractual agreement with TAG Holdings to form the joint venture, VCT. In a joint venture, each venturer commonly participates in the overall management regardless of the percentage of ownership. The common participation in joint ventures is supported by a letter dated November 25, 1997 from Steven C. Riva, Chief, Permitting Section, Air Programs Branch, U.S. EPA, Region 2, to Michael L. Rodburg, Esq., regarding the Dupont Dow Elastomers joint venture. Though IDEM, OAQ is not bound by U.S. EPA guidance, IDEM, OAQ finds the Dupont letter's reasoning persuasive.

However, IDEM, OAQ finds that the two plants do not meet the second element of the definition of major source. The two plants do not have the same two digit SIC code. In order for VNA to be a support facility to VCT, VNA would have to provide at least 50% of its output to VCT. VNA currently provides only 47% of its output to VCT. VNA is not a support facility.

Therefore, these two plants are considered separate sources. This determination is consistent with a separate operating permit issued to VCT (MSOP 113-16637-00080) on October 26, 2004. However, should VNA provide 50% or more of its output to VCT at any time in the future, IDEM, OAQ will reexamine this determination. IDEM, OAQ also plans to reexamine this issue whenever VNA or VCT apply for any permit modification or renewal.

### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Chain-on-Edge coater, identified as COE #2, constructed in 1991, with a maximum capacity of 800 metal parts per hour, utilizing air atomization as the method of application, equipped with dry filters for particulate control, and exhausting at two (2) stacks EO1 and EO2; and
- (b) One (1) Chain-on-Edge-Coater, identified as Sprimag #2, constructed in December 1999, with a maximum capacity of 5,000 metal parts per hour, utilizing high volume low pressure (HVLP) spray application system, equipped with dry filters for particulate control, and exhausting to stack Sprimag #2. (Note: Previous approvals issued to this source identified this unit as COE #5. There are no changes to this facility other than the indicated change in facility identification.)

### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

### Permitted Emission Units and Pollution Control Equipment Removed from the Source

Permitted emission units previously operating at, and removed from the source during this review process:

- (a) One (1) East Chain-on-Edge coater, identified as COE #1, with a maximum capacity of 800 parts per hour, using dry filters as control, and exhausting to stacks EO3 and EO4;
- (b) One (1) North Chain-on-Edge coater, identified as COE #3, with a maximum capacity of 900 parts per hour, using dry filters as control, and exhausting to stack AS2-1;
- (c) One (1) C-170 coater, identified as COE #4, with a maximum capacity of 3,000 metal parts per hour, utilizing high volume low pressure (HVLP) spray application system, equipped with dry filters for particulate control, and exhausting to stack AS2-1;
- (d) One (1) Ford 6.8/2.5 line, consisting of:
  - (1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and
  - (2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack
  - (3) One (1) NMP washer, using no control, exhausting to stack S-14.
  - (4) One (1) spray booth, P-1, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control.
  - (5) One (1) NMP cold cleaner on the Ford 2.5 Duratec line, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;
- (e) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) alkaline wash cold cleaner, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stacks S-11 and S-23.
  - (2) One (1) adhesive roll coater, with a maximum capacity of 105 parts per hour, using no control, and exhausting to stack S-12.

- (3) One (1) NMP washer, using no control, exhausting to stack S-14.
- (4) One (1) spray booth, P-2, with a maximum capacity of 105 metal/rubber parts per hour, using dry filters as control.
- (f) One (1) Honda Accord line, consisting of:
  - (1) One (1) NMP washer, using a non chlorinated solvent, with a capacity of 550 pounds of rubber and metal parts per hour, using no control, and exhausting to general ventilation.
  - (2) One (1) adhesive roll coater, using no control, and exhausting to general ventilation.
  - (3) One (1) water based spray booth, using dry filters as control, and exhausting to general ventilation.
- (g) The following insignificant activities:
  - (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (NMP Washers cold cleaners).
  - (2) Electric curing oven PCO1, with a maximum capacity of 75 pounds per hour, using no control, and exhausting to stack E32.
  - (3) Ford 2.5 Duratec line:
    - (A) One (1) roll coater, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;
    - (B) One (1) spray booth, with a maximum capacity of 46 units per hour, using no control, and exhausting to the atmosphere;
  - (4) 2001 Civic line:
    - (A) One (1) spray booth, with a maximum capacity of 100 units per hour, using no control, and exhausting to the atmosphere;
  - (5) I4/I5 line:
    - (A) One (1) spray booth, with a maximum capacity of 120 units per hour, using no control, and exhausting to the atmosphere;
  - (6) One enclosed mechanical shot blaster, with a maximum capacity of 400 lb/hr of parts, using no control, and exhausting to the atmosphere.

### Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour; including:
  - (1) One (1) Jenfab Washer/Phosphater with a maximum heat input rate of 1 MMBtu per hour;
  - (2) Four (4) space heaters, with a total heat input rate of 0.8 MMBtu per hour;
  - (3) Eight (8) heaters, with a total heat input rate of 10.97 MMBtu per hour; and
  - (4) One (1) furnace containing a 0.2 MMBtu/hr natural gas fired burner.

- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) Safety Kleen Model 81. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) Forced and induced draft noncontact cooling tower system not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Heat exchanger cleaning and repair.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) On-site fire and emergency response training approved by the department.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including the following:  
[326 IAC 6-3-2]
  - (1) One (1) metal casing gritblaster, identified as BL1 (Bronco I Blaster - West Ring Blaster), utilizing steel shot blast media, with a maximum throughput capacity of 180 pounds per hour, with particulate emissions controlled by dust a collector which exhausts inside the building;
  - (2) One (1) metal casing gritblaster, identified as BL2 (Wheelabrator Blaster - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building;
  - (3) One (1) metal casing gritblaster, identified BL3 (Bronco II Tumblast Unit - East), utilizing steel shot blast media, with a maximum throughput capacity of 2,143 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building; and
  - (4) One (1) mold cleaning gritblaster, identified as BL4 (Maxiblast Mold Cleaning Blaster), utilizing plastic bead blast media, with a maximum throughput capacity of 1,000 pounds per hour, with particulate emissions controlled by a dust collector which exhausts inside the building.
- (k) Filter or coalescer media changeout.
- (l) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

- (n) Four (4) final coat spray booths which apply water-based coatings to engine mounts while the part rotates. Each booth uses high volume low pressure (HVLP) spray application and has a single spindle and processes a single part at a time. Particulate emissions are controlled by dry filters. [326 IAC 2-8-4]
- (o) Any unit emitting less than 3 lbs/hr and 15 lbs/day of VOCs, 5 lbs/day and 1 ton per year of any single HAP, 12.5 pounds per day or 2.5 ton per year of any combination of HAPs, 5 lbs/hr and 25 lbs/day of PM/PM-10, including:
  - (1) One (1) Double Stack Transfer Press, identified as #0, with a maximum throughput rate of 0.88 pounds per hour; [326 IAC 2-8-4]
  - (2) Eleven (11) French Oil Transfer Presses, identified as Nos. 1 - 11, each with a maximum throughput rate of 12.87 pounds rubber per hour; [326 IAC 2-8-4]
  - (3) Two (2) French Oil Injection Presses, identified as F26 and F29, each with a maximum throughput rate of 41.76 pounds rubber per hour; [326 IAC 2-8-4]
  - (4) Nine (9) Wabash Transfer Presses, identified as W1 - W6 and H7 - H9, each with a maximum throughput rate of 2.09 pounds rubber per hour; [326 IAC 2-8-4]
  - (5) Eleven (11) Desma Injection Presses, identified as D1 - D8 and D10 - D12; each with a maximum throughput rate of 60 pounds rubber per hour; [326 IAC 2-8-4]
  - (6) Twenty (20) REP Presses, identified as 1 -3, 5, 7 -22, with a total maximum throughput rate of 757 pounds rubber per hour; [326 IAC 2-8-4]
  - (7) Seven (7) LWB Steinel Injection Presses, identified as 1 and 3 - 8, each with a maximum throughput rate of 48.75 pounds rubber per hour; [326 IAC 2-8-4]
  - (8) Six (6) electric post cure ovens, identified as GR0 (previously Big Blue), GR1 (previously PC02), GR2 (previously PC03), GR3 (previously PC04), GR4 and GR5, each with a maximum throughput rate of 28.5 pounds rubber per hour; [326 IAC 6-3-2]
  - (9) One (1) Barwell rubber extruder with a maximum throughput rate of 187.5 pounds rubber per hour; [326 IAC 6-3-2]
  - (10) One (1) 80-inch rubber warm up mill with a maximum throughput rate of 300 pounds rubber per hour; and
  - (11) One (1) Wabash Assembly Press, identified as W44, with an enclosed bath used to fill wet motor mounts with a glycol solution.

### Existing Approvals

The source has operating under the following previous approvals:

- (a) Part 70 Operating Permit T113-7644-00023, issued on June 30, 2000;
- (b) First Significant Source Modification 113-12104-00023, issued on July 11, 2000;
- (c) First Administrative Amendment 113-12453-00023, issued on August 15, 2000;
- (d) First Reopening R113-13439-00023, issued on February 19, 2002;

- (e) First Significant Permit Modification 113-16663-00023, issued on October 22, 2003; and
- (f) Second Administrative Amendment 113-18877-00023, issued on May 12, 2004.

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

- (a) First Significant Permit Modification 113-16663-00023, issued on October 22, 2003, Conditions D.1.1, D.1.3, D.1.4:

#### D.1.1 Volatile Organic Compounds (VOC)

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- (1) The VOC input to each of COE#1, COE#2, and COE#4 coaters shall each be limited to less than 25 tons per year, so that the requirements of 326 IAC 8-1-6 does not apply.
- (2) Any change or modification to the COE#1 through COE#3 that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-1-3.4]

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Pursuant to R 113-10131-00023, issued on September 11, 1998,

- (1) The input of a single hazardous air pollutant (HAP) and the combined HAPs including clean-up solvent, minus solvent shipped outside, delivered to the applicators of the coater, CEO#4, shall be limited to less than 10 and 25 tons per year, rolled on a monthly basis, respectively. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 will not apply.
- (2) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 0.75 ton per month for a single HAP and 2.0 tons per month for combined HAPs.

#### D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

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Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the COE #1 through COE #5 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.1.4 Particulate [326 IAC 6-3-2(d)]

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- a) Pursuant to 326 IAC 6-3-2(d), particulate from the COE#1 through COE#5 shall be controlled by dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer=s specifications. This requirement to operate the control is not federally enforceable.
- b) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the five (5) chain-on-edge (COE#1 – COE#5) coaters are in operation.

*Reason changed:* The coating facilities identified as COE #1, COE #3 and COE #4 have been removed from the source. Therefore, D.1.1, D.1.3 and D.1.4 have been revised to remove reference to these coaters, and Condition D.1.2 is removed in its entirety. Further, D.1.1(2) is a statement rather than a requirement, and it has been deleted. Finally, D.1.3 is no longer an applicable requirement, as the 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP. As such, D.1.4 is now federally enforceable and the final sentence of paragraph a) is removed.

(b) First Significant Permit Modification 113-16663-00023, issued on October 22, 2003;

Sections D.2, D.3 and D.4 have been removed from the permit.

*Reason changed:* Sections D.2, D.3 and D.4 are removed from the permit because the related facilities pertain to the previous automobile parts production operations at 1496 Gerber Street (Plant 2) which are now owned and operated by Vibration Control Technologies (VCT) as a separate source (see related source definition discussion previously in this document).

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on September 30, 2004. Additional information was received on September 22, 2005, September 6, 2006, which was the application receipt date for the request to transition the Part 70 renewal to a FESOP, September 14, 2006, and November 15, 2006.

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

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (15 pages).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Part 70 permit.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	< 100
PM-10	< 100
SO <sub>2</sub>	< 100
VOC	> 100, < 250
CO	< 100
NO <sub>x</sub>	< 100

HAPs	Unrestricted Potential Emissions (tons/yr)
Glycol ethers	< 10
Methy Isobutyl Ketone (MIBK)	> 10
Xylene	> 10
Toluene	> 10
Aniline	< 10
Carbon disulfide	> 10
Carbon tetrachloride	< 10
Hexane	< 10
Other HAPs	< 10 (all)
Total	> 25

- (a) The unrestricted potential emissions of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Potential to Emit After Issuance**

The source was issued Part 70 Operating Permit T113-7644-00023 on June 30, 2000, and the Permittee has opted to transition from a Part 70 source to a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original Part 70 and now included in this FESOP.

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single <sup>3</sup>	Total
COE #2 & Sprimag #2 (combined) <sup>1</sup>	1.86	1.86	0.00	25	0.00	0.00	5	10
Rubber Warm-up Mill (1 unit)*	0.00	0.00	0.00	0.85	0.00	0.00	0.02	0.10
Rubber Extruding (1 unit)*	0.00	0.00	0.00	0.09	0.00	0.00	0.01	0.06
Rubber Extruding Release*	0.00	0.00	0.00	0.29	0.00	0.00	0.00	0.00
Rubber Pressing (61 Presses)* <sup>2</sup>	0.00	0.00	0.00	33.42	0.00	0.00	2.99	6.80
Rubber Pressing Mold Release* <sup>2</sup>	0.00	0.00	0.00	3.81	0.00	0.00	0.00	0.00
Rubber Post Curing*	0.51	0.51	0.00	14.00	0.00	0.00	0.14	2.58
Wabash Assembly Press*	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.01
Final Coat Spray Booths (4 units)*	4.96	4.96	0.00	2.20	0.00	0.00	0.00	0.92
Jenfab Washer/Phosphater*	0.00	0.00	0.00	2.74	0.00	0.00	0.00	0.00
Bronco I Blaster BL1*	7.82	7.82	0.00	0.00	0.00	0.00	0.00	0.00
Wheelabrator Blaster BL2*	7.82	7.82	0.00	0.00	0.00	0.00	0.00	0.00
Bronco II Tumblast Unit BL3*	7.82	7.82	0.00	0.00	0.00	0.00	0.00	0.00
Mold Cleaning Gritblaster, BL4*	4.30	4.30	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas-Fired Heating Units*	0.43	0.43	0.03	0.31	4.49	5.64	0.00	0.00
Safety Kleen Parts Washer*	0.00	0.00	0.00	0.33	0.00	0.00	0.00	0.00
<b>Total PTE</b>	<b>35.52</b>	<b>35.52</b>	<b>0.03</b>	<b>83.05</b>	<b>4.49</b>	<b>5.64</b>	<b>8.16</b>	<b>20.47</b>
<b>Title V Permit Threshold</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>10</b>	<b>25</b>

Notes:  
 1. Reflects VOC, single & combined HAP usage limitations at Condition D.1.1.  
 2. Reflects 10,000,000 lb/yr rubber pressing limitation at Condition D.2.1, such that total source VOC is limited to less than 100 tons per year and single HAP (carbon disulfide) is limited to less than 10 tons per year.  
 3. This column reflects the worst-case single HAP for the entire source, methyl isobutyl ketone (MIBK). See Appendix A for other HAPs.  
 \* Insignificant Activity.

**County Attainment Status**

The source is located in Noble County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (c) Noble County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (d) Noble County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	35.5
PM-10	35.5
SO <sub>2</sub>	0.03
VOC	< 100
CO	4.5
NO <sub>x</sub>	5.6
Single HAP	< 10
Combination HAPs	< 25

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This status is based on the potential to emit for this source after issuance (see Potential to Emit After Issuance table above, and Appendix A).

### Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source has transitioned to a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

- (b) There are no New Source Performance Standards (NSPS) (325 IAC 12 and 40 CFR Part 60) incorporated into this permit.
- (c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63, Subpart M) because the potential to emit of single HAPs at this source is limited to less than ten (10) tons per year and the potential to emit the combination of HAPs is limited to less than twenty-five (25) tons per year. Since this is an area source of hazardous air pollutants, as defined at 40 CFR 63.2, the source is not subject to the requirements of 40 CFR Part 63, Subpart M and the related rule requirements are not included in the permit.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

### **State Rule Applicability – Entire Source**

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

This source was originally constructed on or around 1990, which is after the August 7, 1977 rule applicability date. This source is not one of the 28 listed source categories and it does not have the potential to emit of 250 tons per year (tpy) or more of a regulated pollutant. Further, the source shall operate in accordance with the provisions of 326 IAC 2-8 (FESOP) which limits the potential to emit of each criteria pollutant from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

#### **326 IAC 2-4.1-1 (New Source Toxics Control)**

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

Coater CEO #4, which was installed in 1998 and was restricted by permit to less than 10 and 25 tons per year (tpy) of single and combined HAPs respectively, has been removed from the source during this review. Coater Sprimag #2, which was installed in 1999, and all other facilities at this source do not have the potential to emit HAPs at the specified rule applicability thresholds. Further, this FESOP establishes respective limits of less than 10 and 25 tpy for single HAPs and combined HAPs for the entire source. The requirements of this rule do not apply to the source.

### 326 IAC 2-6 (Emission Reporting)

Since this source was previously required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source was subject to 326 IAC 2-6 (Emission Reporting). However, the transition of the Part 70 permit to a FESOP negates this requirement. Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 no longer applies.

### 326 IAC 2-8-4 (FESOP)

The potential to emit of VOC from the source, before controls and limitations, is greater than one hundred (100) tons per year (tpy). The potential to emit a single HAP before controls from this source is greater than ten (10) tpy for a single HAP (MIBK, xylene, toluene and carbon disulfide), and is greater than twenty five (25) tpy for total HAPs. Pursuant to 326 IAC 2-8-4 (FESOP), the source shall comply with the following coating material usage and rubber production limitations such that the requirements of 326 IAC 2-7 (Part 70) do not apply:

- (a) The total usage of VOC at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, 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.
- (b) Total usage of any single HAP at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, shall be limited to less than five (5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Total usage of the combination of HAPs at coaters COE #2 and Sprimag #2 combined, including solvent used for clean-up, shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) Coating materials applied at COE #2 and Sprimag #2 shall not contain carbon disulfide or aniline.
- (e) The total rubber input to all molding presses shall not exceed ten million (10,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions shall be limited to 6.68E-03 lb/lb rubber pressed. These limits are equivalent to 33.42 tons VOC/year. The total HAP emissions shall be limited to 1.36E-03 lb/lb rubber pressed. These limits are equivalent to 6.80 tons total HAPs/year. The carbon disulfide emissions shall be limited to 1.32E-03 lb/lb rubber pressed. These limits are equivalent to 6.61 tons of carbon disulfide/year.

Compliance with these limits shall result in limiting source wide VOC, single HAP and combined HAPs to less than 100, 10 and 25 tpy, respectively. Therefore, this permit is issued pursuant to 326 IAC 2-8-4.

### 326 IAC 5-1 (Opacity Limitations)

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

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

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule is not applicable because the source began operation after January 1, 1980.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Noble County. Therefore, this rule is not applicable to this source.

**State Rule Applicability – Individual Facilities**

**326 IAC 6-3-2 (Particulate Emission Limitations)**

The Permittee shall comply as follows:

- (a) Pursuant to Significant Permit Modification No. 113-16663-00023, issued on October 22, 2003, and 326 IAC 6-3-2(d), particulate from the one (1) West Chain-on-Edge coater, COE #2, and one (1) Chain-on-Edge-Coater, Sprimag #2, shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-1(b)(15), the four (4) final coat spray booth, as insignificant activities, use less than five (5) gallons per day. This is reflected in Administrative Amendment 113-18877-00023, issued on May 12, 2004, and verified by the Permittee during this review. Therefore, the requirements of 326 IAC 6-3-2(d), are not applicable to these units. This notwithstanding, the facilities are voluntarily equipped with, and controlled by, particulate dry filters.
- (c) Pursuant to 326 IAC 6-3-2(e), the particulate emission rate from the facilities listed below, as insignificant activities, shall be limited as specified when operating at the respective process weight rate:

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)	Uncontrolled Particulate Emission Rate (lb/hr)
Bronco I Blaster BL1	180	0.82	0.037*
Wheelabrator Blaster BL2	2,143	4.29	1.785
Bronco II Tumblast Unit BL3	2,143	4.29	1.785
Mold Cleaning Gritblaster, BL4	1,000	2.58	0.982
Rubber Extruding (1 Unit)	188	0.84	2.59E-05
Rubber Post-Curing (6 Units)	28.5 (each)	0.551 (each)	0.02 (each)

\*Based on controlled emission rate of 0.16 tpy (see Appendix A).

The pounds per hour allowable particulate emission rates were calculated with the following equation:

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

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

Based on the calculations made, these facilities will be able to comply with these requirements (see TSD, Appendix A). Although the potential to emit particulate from BL2 - BL4 is less than the allowable emission limits calculated above, the Permittee will use the dust collectors for the gritblasters to ensure compliance with the limits above. The potential to emit particulate for the extruder and post cure ovens is less than the allowable emission limits calculated above. Therefore, no controls are required for these units to comply with 326 IAC 6-3-2.

#### 326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

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

The one (1) West Chain-on-Edge coater, COE #2, is potentially subject to the requirements of 326 IAC 8-1-6. Pursuant to Part 70 Permit T113-7644-00023, issued on June 30, 2000, the VOC input to the COE #2 coater shall be limited to less than 25 tons per year, so that the requirements of 326 IAC 8-1-6 do not apply. The one (1) Chain-on-Edge-Coater, Sprimag #2, is not subject to the requirements of 326 IAC 8-1-6 (BACT) because the potential to emit of VOC is less than 25 tons per year.

Pursuant to this transition request and 326 IAC 2-8-4 (FESOP), the Permittee has requested that the emission limitation of 25 tons per year specified for COE #2 be applied to COE #2 and Sprimag #2 combined. The permit has been revised as requested.

There are no other facilities, including each of the 61 rubber molding presses, at this source that have potential VOC emissions of 25 tons per year or more (see Appendix A). Therefore, this rule does not apply to this source.

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

This source is not subject to this rule because 326 IAC 8-2-9 applies to any industrial category which coats metal parts of products under Standard Industrial Classification (SIC) Code of major groups #33, #34, #35, #36, #37, #38 and #39. The SIC code for this source is 3061 and therefore 326 IAC 8-2-9 is not applicable. This determination is consistent with that made by IDEM as Appeal Item No. 4 in Significant Permit Modification 113-16663-00023, issued on October 22, 2003.

#### 326 IAC 8-3-2 (Cold Cleaner Degreaser Operations)

The one (1) Safety-Kleen type parts washer (Model 81), as an insignificant activity, was installed in November 1997 and is subject to the requirements of this rule. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the source shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;

- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

The one (1) Safety-Kleen type parts washer (Model 81), as an insignificant activity, was installed in November 1997 and is not equipped with a remote reservoir. Therefore the source shall comply with the following requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Testing Requirements

Compliance testing is not required of this source. The coating material usage and related VOC and volatile organic HAP emissions are based on an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation. Also, the Permittee shall maintain monthly rubber processing records that are used in combination with AP-42 emission factors to demonstrate related emission limitation compliance. The Permittee shall comply with the relevant monitoring, record keeping and reporting requirements incorporated into the permit.

### Compliance Requirements

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

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

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

1. The coaters COE #2 and Sprimag #2 have applicable compliance monitoring conditions as specified below:

Pursuant to Significant Permit Modification 113-16663-00023, issued on October 22, 2003, the source is subject to the training requirements specified below. These compliance monitoring requirements satisfy and resolve Appeal Item No. 7 stated in the Technical Support Document to Significant Permit Modification 113-16663-00023.

- (a) All spray booth operators or employees that perform maintenance at the facilities listed in the Chain-on-Edge coaters shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

These monitoring conditions are necessary because coaters COE #2 and Sprimag #2 and their related particulate dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies) and 326 IAC 2-8 (FESOP).

### **Conclusion**

The operation of this stationary rubber product manufacturing source shall be subject to the conditions of the **FESOP 113-23616-00023**.

**Appendix A: Emission Calculations**

**Company Name:** Vibracoustic North America  
**Address City IN Zip:** 1497 Gerber Street, Ligonier, IN 46767  
**FESOP No.:** F113-23616-00023  
**Reviewer:** Michael Hirtler/ EVP  
**Date:** Sep-06

**Potential to Emit Summary**

Emissions Category	Criteria Pollutants, tons per year						Other Reg. Pollutants, tons (1)	Hazardous Air Pollutants, tons per year (2)																	
	PM-10	NOx	SO2	VOC	CO	Lead		TSP	Total HAPs	Glycol Ethers	Ethylene Glycol 107-21-1	Selenium 7782-49-2	MeOH 67-56-1	MIBK 108-10-1	Meth. Chloride 75-09-2	HCOH 50-00-0	Xylene 1330-20-7	Ethyl Benzene 100-41-4	Phenol 108-95-2	Toluene 108-88-3	Aniline 62-53-3	Carbon Disulfide 75-15-0	Carbon Tet. 56-23-5	Hexane 110-54-3	
Bronco I Blaster BL1	7.82						7.82																		
Wheelabrator Blaster BL2	7.82						7.82																		
Bronco II Tumbblast Unit BL3	7.82						7.82																		
Jenfab Washer/Phosphater				2.74																					
COE#2 Coater	10.02			25.00			10.02	31.37			1.16	0.20	21.93	0.00	0.08	12.50	1.15	0.77	17.84						
Sprimag 2 Coater	27.15			10.94			27.15	15.39			3.73	1.31	0.15	0.03											
Rubber Warm-up Milling				0.85				0.10					0.02	0.01		0.02	0.00	8.65E-04	0.02	0.01	0.07	0.03	0.08		
Rubber Extruding	0.00			0.09			1.13E-04	0.06					0.01	0.02		0.01	0.00	5.59E-04	0.01	4.17E-04	0.05	0.02	0.05		
Rubber Extruding Releases				0.29																					
Rubber Pressing				58.63				11.94					5.25	0.43		0.31	0.05	0.02	0.35	8.91	11.59	8.03	2.63		
Rubber Pressing Mold Releases				6.69																					
Rubber Post Curing	0.51			14.00			0.51	2.58					0.14	0.71		0.40	0.08	0.02	0.42	0.01	1.03	0.18	2.08		
Wabash Assembly Press				0.01				0.01																	
Final Coat Spray Booths	4.96			2.20			4.96	0.92	0.58	0.34															
Mold Cleaning Gritblaster, BL4	4.30						4.30																		
Natural Gas-Fired Heating Units	0.43	5.64	0.03	0.31	4.49		0.43																		
Safety Kleen Parts Washer, Model 81.0				0.33																					
<b>TOTAL EMISSIONS, TPY</b>	<b>70.83</b>	<b>5.64</b>	<b>0.03</b>	<b>122.08</b>	<b>4.49</b>	<b>0.00</b>	<b>70.83</b>	<b>62.36</b>	<b>0.58</b>	<b>0.35</b>	<b>4.90</b>	<b>1.52</b>	<b>27.51</b>	<b>1.20</b>	<b>0.08</b>	<b>13.25</b>	<b>1.29</b>	<b>0.82</b>	<b>18.63</b>	<b>8.92</b>	<b>12.74</b>	<b>8.26</b>	<b>4.83</b>		
<b>TITLE V MAJOR SOURCE THRESHOLD, TPY</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>--</b>	<b>25</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>

**NOTES:**  
 (1) Other regulated pollutants does not include those pollutants regulated only under CAA Section 112(r)  
 (2) For emissions of HAPs not listed in this table, see rubber processing calculations

**Appendix A: Emission Calculations**

**Company Name:** Vibracoustic North America  
**Address City IN Zip:** 1497 Gerber Street, Ligonier, IN 46767  
**FESOP No.:** F113-23616-00023  
**Reviewer:** Michael Hirtler/ EVP  
**Date:** Sep-06

**Limited Potential to Emit Summary**

Emissions Category	Criteria Pollutants, tons per year						Other Reg. Pollutants, tons (1)	Hazardous Air Pollutants, tons per year (2)																
	PM-10	NOx	SO2	VOC	CO	Lead	TSP	Total HAPs	Glycol Ethers	Ethylene Glycol 107-21-1	Selenium 7782-49-2	MeOH 67-56-1	MIBK 108-10-1	Meth. Chloride 75-09-2	HCOH 50-00-0	Xylene 1330-20-7	Ethyl Benzene 100-41-4	Phenol 108-95-2	Toluene 108-88-3	Aniline 62-53-3	Carbon Disulfide 75-15-0	Carbon Tet. 56-23-5	Hexane 110-54-3	
Bronco I Blaster BL1	7.82						7.82																	
Wheelabrator Blaster BL2	7.82						7.82																	
Bronco II Tumbblast Unit BL3	7.82						7.82																	
Jenfab Washer/Phosphater				2.74																				
<b>COE Adhesive Application (3)</b>	1.86			<b>25.00</b>			1.86	<b>10.00</b>			<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>	<b>5.00</b>					
Rubber Warm-up Milling				0.85				0.10					0.02	0.01		0.02	0.003	8.65E-04	0.02	0.01	0.07	0.03	0.08	
Rubber Extruding	0.00			0.09			1.13E-04	0.06					0.01	0.02		0.01	0.002	5.59E-04	0.01	4.17E-04	0.05	0.02	0.05	
Rubber Extruding Releases				0.29																				
<b>Rubber Pressing (4)</b>				<b>33.42</b>				<b>6.80</b>					<b>2.99</b>	<b>0.24</b>		<b>0.18</b>	<b>0.03</b>	<b>0.01</b>	<b>0.20</b>	<b>5.08</b>	<b>6.61</b>	<b>4.57</b>	<b>1.50</b>	
<b>Rubber Pressing Mold Releases (4)</b>				<b>3.81</b>																				
Rubber Post Curing	0.51			14.00			0.51	2.58					0.14	0.71		0.40	0.08	0.02	0.42	0.01	1.03	0.18	2.08	
Wabash Assembly Press				0.01				0.01		0.01														
Final Coat Spray Booths	4.96			2.20			4.96	0.92	0.58	0.34														
Mold Cleaning Gritblaster, BL4	4.30						4.30																	
Natural Gas-Fired Heating Units	0.43	5.64	0.03	0.31	4.49		0.43																	
Safety Kleen Parts Washer, Model 81.0				0.33																				
<b>TOTAL EMISSIONS, TPY</b>	<b>35.52</b>	<b>5.64</b>	<b>0.03</b>	<b>83.05</b>	<b>4.49</b>	<b>0.00</b>	<b>35.52</b>	<b>20.47</b>	<b>0.58</b>	<b>0.35</b>	<b>5.00</b>	<b>5.00</b>	<b>8.16</b>	<b>5.98</b>	<b>5.00</b>	<b>5.61</b>	<b>5.11</b>	<b>5.04</b>	<b>5.64</b>	<b>5.09</b>	<b>7.75</b>	<b>4.80</b>	<b>3.70</b>	
<b>TITLE V MAJOR SOURCE THRESHOLD, TPY</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>--</b>	<b>25</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>

**NOTES:**

- (1) Other regulated pollutants does not include those pollutants regulated only under CAA Section 112(r)
- (2) For emissions of HAPs not listed in this table, see rubber processing calculations
- (3) Reflects the proposed limits of 25 tpy VOC, 10 tpy total HAPs, and 5 tpy any one coating HAP from COE#2 & Sprimag#2 combined  
Potential particulate unaffected, equal to sum of individual potential from each unit
- (4) Reflects the proposed production limit of 10,000,000 pounds rubber pressed per year

**Appendix A: Emission Calculations**

Company Name: Vibracoustic North America  
 Address City IN Zip: 1497 Gerber Street, Ligonier, IN 46767  
 FESOP No.: F113-23616-00023  
 Reviewer: Michael Hirtler/ EVP  
 Date: Sep-06

**Emission Unit: Bronco I Blaster, BL1 (West Ring Blaster)**

**Source Information:**  
 Annual Particulate Collected, pounds 9,100 Source information (based on actual of 175 lbs/week, extrapolated to 52 weeks/yr)  
 Normal Annual Operating Hours 5,200 Source information (based on actual of 100 hrs/week, extrapolated to 52 weeks/yr)  
 Maximum Annual Operating Hours 8,760 Continuous Operation  
 Maximum Hourly Throughput, lbs 180 Operator (15 lbs max load, minimum load time 5 minutes)

**Emission Calculations:**

Basis	Annual Particulate Collected	Collector Control Efficiency (1)	Annual Particulate Generated	Venting Location (Indoors/Outdoors)	Particulate Emissions (2)	
	pounds	%	pounds		lbs/yr	tons/yr
<b>2005 Actual Emissions:</b>	9,100	98.0	9,285.71	Indoors	185.71	0.09
<b>Potential Uncontrolled Emissions:</b>	0	0.0	15,643	Indoors	15,642.86	7.82
<b>Controlled Emissions:</b>					312.86	0.16

Allowable emission limit, pursuant to 326 IAC 6-3-2:  $4.10 * P^{0.67} = 0.82$  lb/hour = 3.58 (equiv tpy, will be able to comply)

**Emission Unit: Wheelabrator Blaster, BL2 (East)**

**Source Information:**  
 Annual Particulate Collected, pounds 9,100 Source information (based on actual of 175 lbs/week, extrapolated to 52 weeks/yr)  
 Normal Annual Operating Hours 5,200 Source information (based on actual of 100 hrs/week, extrapolated to 52 weeks/yr)  
 Maximum Annual Operating Hours 8,760 Continuous Operation  
 Maximum Hourly Throughput, lbs 2,143 Operator (250 lbs max load, minimum load time 7 minutes)

**Emission Calculations:**

Basis	Annual Particulate Collected	Collector Control Efficiency (1)	Annual Particulate Generated	Venting Location (Indoors/Outdoors)	Particulate Emissions (2)	
	pounds	%	pounds		lbs/yr	tons/yr
<b>2005 Actual Emissions:</b>	9,100	98.0	9,285.71	Indoors	185.71	0.09
<b>Potential Uncontrolled Emissions:</b>	0	0.0	15,643	Indoors	15,642.86	7.82
<b>Controlled Emissions:</b>					312.86	0.16

Allowable emission limit, pursuant to 326 IAC 6-3-2:  $4.10 * P^{0.67} = 4.29$  lb/hour = 18.81 (equiv tpy, will be able to comply)

**Emission Unit: Bronco II Tumbblast Unit, BL3 (East)**

**Source Information:**  
 Annual Particulate Collected, pounds 9,100 Source information (based on actual of 175 lbs/week, extrapolated to 52 weeks/yr)  
 Normal Annual Operating Hours 5,200 Source information (based on actual of 100 hrs/week, extrapolated to 52 weeks/yr)  
 Maximum Annual Operating Hours 8,760 Continuous Operation  
 Maximum Hourly Throughput, lbs 2,143 Operator (250 lbs max load, minimum load time 7 minutes)

**Emission Calculations:**

Basis	Annual Particulate Collected	Collector Control Efficiency (1)	Annual Particulate Generated	Venting Location (Indoors/Outdoors)	Particulate Emissions (2)	
	pounds	%	pounds		lbs/yr	tons/yr
<b>2005 Actual Emissions:</b>	9,100	98.0	9,285.71	Indoors	185.71	0.09
<b>Potential Uncontrolled Emissions:</b>	0	0.0	15,643	Indoors	15,642.86	7.82
<b>Controlled Emissions:</b>					312.86	0.16

Allowable emission limit, pursuant to 326 IAC 6-3-2:  $4.10 * P^{0.67} = 4.29$  lb/hour = 18.81 (equiv tpy, will be able to comply)

**Emission Unit: Maxiblast Mold Cleaning Blaster, BL4**

**Source Information:**  
 Blaster Media Plastic Plant Walkthrough  
 Annual Particulate Collected, lbs 3,600 Source Information (based on actual of 300 lbs/month, maximum, extrapolated to 12 mn/yr)  
 Normal Annual Operating Hours 3,744 Source Information (3 shifts/day, 5 days/week, 52 weeks/yr, runs 60% of time)  
 Maximum Annual Operating Hours 8,760 Continuous Operation  
 Air Flow Rate, cfm 1,200 Maxiblast  
 Grain Loading 0.0164 Calculated Value  
 Maximum Hourly Throughput, lbs 1,000 Operator (1000 lbs max load, minimum load time 1 hour)

**Emission Calculations:**

Basis	Annual Particulate Collected	Collector Control Efficiency (1)	Annual Particulate Generated	Annual Particulate Released	Venting Location (Indoors/Outdoors)	Particulate Emissions (2)	
	pounds	%	pounds	pounds		lbs/yr	tons/yr
<b>Actual Emissions:</b>	3,600	98.0	3,673.47	73.47	Indoors	73.47	0.04
<b>Potential Uncontrolled Emissions:</b>	0	0.0	8,595	8,595	Indoors	8,594.98	4.30
<b>Controlled Emissions:</b>						171.90	0.09

Allowable emission limit, pursuant to 326 IAC 6-3-2:  $4.10 * P^{0.67} = 2.58$  lb/hour = 11.29 (equiv tpy, will be able to comply)

**Methodology:**

(1) Engineering estimate; for potential emissions, exclude control efficiency of filters for this indoor activity.

(2) Assume that all particulate emitted is PM-10

**Example Calculations:**

Potential Particulate Generated, lbs = Annual Actual Particulate Collected, pounds / (Collector Control Efficiency, % /100) \* (Max /Actual Annual Oper. Hrs)

Potential Particulate Emitted, lbs = Particulate Generated, lbs; Particulate (tons/yr) = particulate (lb/yr) / 2000 lb/ton

Particulate Emitted, lbs = (Particulate Generated, pounds - Particulate Collected, pounds); Particulate (tons/yr) - particulate (lb/yr) / 2000 lb/ton

## Appendix A: Emission Calculations

**Company Name:** Vibracoustic North America  
**Address City IN Zip:** 1497 Gerber Street, Ligonier, IN 46767  
**FESOP No.:** F113-23616-00023  
**Reviewer:** Michael Hirtler/ EVP  
**Date:** Sep-06

**Emission Unit:** Jenfab Washer/Phosphater

### Potential Emissions:

Material	Material Density (a) lbs/gal	Composition (a) Wt. %	Maximum Hourly Usage (b) gph	Hourly VOC Emissions lb/hr	Daily VOC Emissions lb/day	Annual VOC Emissions tpy
Texolite 1391SL	10.01	0.0	1	0.0	0.0	0.0
38090	13.21	0.0	1	0.0	0.0	0.0
ECLPS 2400	8.34	7.5	1	0.6	15.0	2.7
<b>Total:</b>						<b>2.7</b>

(a) MSDSs

(b) No usage data was available from the plant since this unit is not yet in operation.

As an extremely conservative estimate, these calculations assume 1 gallon per day of each of the three planned chemicals.

**Appendix A: Emission Calculations**

Company Name: Vibracoustic North America  
 Address City IN Zip: 1497 Gerber Street, Ligonier, IN 46767  
 FESOP No.: F113-23616-00023  
 Reviewer: Michael Hirtler/ EVP  
 Date: Sep-06

**COE#2 - West Spray Coater**

Material As-Applied	Material Density lbs/gal	Usage Per Part gal/part	Max Parts Per Hour part/hr	Maximum Usage gal/hr	Maximum Usage lb/hr	Maximum Usage lb/yr	Material Compositional Breakdown - As Applied										Potential Emissions																		
							VOC Wt. %	Solids Wt. %	Se Wt. %	MeOH Wt. %	MIBK Wt. %	Meth Chl Wt. %	HCOH Wt. %	Xylene Wt. %	Eth Benz Wt. %	Phenol Wt. %	Toluene Wt. %	VOC (a) lbs	Solids lbs	Se lbs	MeOH lbs	MIBK lbs	Meth Chl lbs	HCOH lbs	Xylene lbs	Eth Benz lbs	Phenol lbs	Toluene lbs	Total HAP lbs						
Chemlok 8001	9.52	0.00139	800	1.11	10.59	92,735	3.7	35.0	0.0	0.4	0.0	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,403	32,420	0	408	0	0	0	0	0	0	0	0	0	408
Chemlok 8200	9.54	0.00139	800	1.11	10.61	92,930	2.7	36.4	5.0	0.1	0.1	0.01	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,463	33,780	4,647	84	46	9	0	0	0	0	0	0	4,786	
Chemlok 8560S	10.00	0.00139	800	1.11	11.12	97,411	0.1	41.2	0.0	0.0	0.0	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	49	40,094	0	0	0	0	0	0	0	0	0	0	0	
Megum 3351	7.90	0.00139	800	1.11	8.78	76,955	74.7	25.0	0.0	0.0	57.0	0.00	0.2	13.0	3.0	2.0	0.0	0.0	0.0	0.0	0.0	57,473	19,239	0	0	43,864	0	154	10,004	2,309	1,539	0	0	57,870	
Thixon 532-EF	7.99	0.00139	800	1.11	8.89	77,836	78.23	22.04	0.00	0.00	0.00	0.00	0.00	32.13	2.64	0.00	45.84	0.00	0.00	0.00	0.00	60,895	17,153	0	0	0	0	0	25,005	2,058	0	35,678	62,741		
<b>Worst Case Coating, pounds/yr:</b>												60,895	40,094	4,647	408	43,864	9	154	25,005	2,309	1,539	35,678	62,741												
<b>Adjustment for Solids:</b>																																			
Transfer Efficiency, % (c)												50		20,047		2,323																			
<b>Total Uncontrolled Emissions, pounds/yr</b>												60,895	20,047	2,323	408	43,864	9	154	25,005	2,309	1,539	35,678	62,741												
<b>Total Uncontrolled Emissions, tons/yr</b>												<b>30.45</b>	<b>10.02</b>	<b>1.16</b>	<b>0.20</b>	<b>21.93</b>	<b>0.00</b>	<b>0.08</b>	<b>12.50</b>	<b>1.15</b>	<b>0.77</b>	<b>17.84</b>	<b>31.37</b>												
<b>Adjustment for Solids:</b>																																			
Control Efficiency of Filters, % (b), (c)												95		1,002		116																			
<b>Total Limited Emissions, pounds/yr</b>												50,000	1,002	116	408	43,864	9	154	25,005	2,309	1,539	35,678	62,741												
<b>Total Limited Emissions, tons/yr</b>												<b>25.00</b>	<b>0.50</b>	<b>0.06</b>	<b>0.20</b>	<b>21.93</b>	<b>0.00</b>	<b>0.08</b>	<b>12.50</b>	<b>1.15</b>	<b>0.77</b>	<b>17.84</b>	<b>31.37</b>												

(a) Worst cast uncontrolled PTE of VOC (and other compounds) shown; however, VOC is limited at this emission unit to 25 tpy by D.1.1(1) of operating permit T113-7644-00023. This enforceable limit  
 (b) Emissions, lbs = Overspray, lbs x ((100 - control efficiency)/100)  
 (c) Efficiency based on AP-40 for air atomized application; use of filters is federally enforceable per D.1.4(b) of operating permit T113-7644-00023 (i.e., 326 IAC 6-3-2(d)).

**Appendix A: Emission Calculations**

**Company Name: Vibracoustic North America**  
**Address City IN Zip: 1497 Gerber Street, Ligonier, IN 46767**  
**FESOP No.: F113-23616-00023**  
**Reviewer: Michael Hirtler/ EVP**  
**Date: Sep-06**

**Sprimag #2**

Material As-Applied	Material Density lbs/gal	Usage Per Part gal/part	Max Parts Per Hour part/hr	Maximum Usage gal/hr	Maximum Usage lb/hr	Maximum Usage lb/yr	Material Compositional Breakdown - As Applied						Potential Emissions						
							VOC Wt. %	Solids Wt. %	Se Wt. %	MeOH Wt. %	MIBK Wt. %	Meth Chl Wt. %	VOC lbs	Solids lbs	Se lbs	MeOH lbs	MIBK lbs	Meth Chl lbs	Total lbs
Chemlok 8001	9.52	0.00143	5,000	7.15	68.07	596,276	3.7	35.0	0.0	0.44	0.0	0.0	21,883	208,458	0	2,624	0	0	2,624
Chemlok 8200	9.54	0.00143	5,000	7.15	68.21	597,528	2.7	36.4	5.0	0.09	0.05	0.01	15,835	217,202	29,876	538	299	60	30,773
<b>Worst Case Coating, pounds/yr:</b>													21,883	217,202	29,876	2,624	299	60	30,773
<b>Adjustment for Solids:</b>																			
Transfer Efficiency, % (b)				75										54,300	7,469				
<b>Total Uncontrolled Emissions, pounds/yr</b>													21,883	54,300	7,469	2,624	299	60	30,773
<b>Total Uncontrolled Emissions, ton/yr</b>													<b>10.94</b>	<b>27.15</b>	<b>3.73</b>	<b>1.31</b>	<b>0.15</b>	<b>0.03</b>	<b>15.39</b>
<b>Adjustment for Solids:</b>																			
Control Efficiency of Filters, % (a), (b)				95										2,715	373				
<b>Total Emissions, pounds/yr</b>													21,883	2,715	373	2,624	299	60	3,356
<b>Total Emissions, tons/yr</b>													<b>10.94</b>	<b>1.36</b>	<b>0.19</b>	<b>1.31</b>	<b>0.15</b>	<b>0.03</b>	<b>1.68</b>

(a) Emissions, lbs = Overspray, lbs x ((100 - control efficiency)/100)

(b) Efficiency based on AP-40 for HVLP application; use of filters is federally enforceable per D.1.4(b) of operating permit T113-7644-00023 (i.e., 326 IAC 6-3-2).

**Appendix A: Emission Calculations**  
**Company Name:** Vibracoustic North America  
**Address City IN Zip:** 1497 Gerber Street, Ligonier, IN 46767  
**FESOP No.:** F113-23616-00023  
**Reviewer:** Michael Hirtler/ EVP  
**Date:** Sep-06

Emission Unit	Total Max. throughput (lb/hr)
Milling (1 unit)	300
Extruding: (1 unit)	188
Platen Pressing: (61 total units)	2,003
Oven Curing: (6 total units)	171

**Rubber Processing**  
(page 1 of 2)

Pollutant Name	CAS No.	Maximum Emission Factors, by Operation				Maximum PTE, by Operation					Limited PTE, by Operation				
		Milling	Extruding	Platen Pressing	Oven Curing (Adjusted)	Milling	Extruding	Platen Pressing	Oven Curing	Total Maximum PTE	Milling	Extruding	Platen Pressing	Oven Curing	Total Limited PTE
		lb/lb rubber	lb/lb rubber	lb/lb rubber	lb/lb rubber	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy
<b>Production Rate (lb/year)</b>						2,628,000	1,642,500	17,546,103	1,497,960		2,628,000	1,642,500	<b>10,000,000</b>	1,497,960	
<b>Total VOC</b>		6.48E-04	1.06E-04	6.68E-03	1.87E-02	8.52E-01	8.74E-02	5.86E+01	1.40E+01	73.57	8.52E-01	8.74E-02	3.34E+01	1.40E+01	48.36
<b>Total HAPs</b>		7.28E-05	7.53E-05	1.36E-03	3.45E-03	9.57E-02	6.18E-02	1.19E+01	2.58E+00	14.68	9.57E-02	6.18E-02	6.80E+00	2.58E+00	9.54
<b>Total Particulate Matter</b>		0.00E+00	1.38E-07	0.00E+00	0.00E+00	0.00E+00	1.13E-04	0.00E+00	0.00E+00	0.00	0.00E+00	1.13E-04	0.00E+00	0.00E+00	0.00
1,1,1-Trichloroethane	71-55-6	3.79E-07	3.92E-07	3.56E-04	1.47E-05	4.98E-04	3.22E-04	3.13E+00	1.10E-02	3.14E+00	4.98E-04	3.22E-04	1.78E+00	1.10E-02	1.79E+00
1,1,2,2-Tetrachloroethane	79-34-5	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1,2-Trichloroethane	79-00-5	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1-Dichloroethane	75-34-3	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,1-Dichloroethene	75-35-4	1.14E-07	1.17E-07	1.07E-05	5.40E-06	1.49E-04	9.65E-05	9.38E-02	4.04E-03	9.81E-02	1.49E-04	9.65E-05	5.35E-02	4.04E-03	5.78E-02
1,2,4-Trichlorobenzene	120-82-1	0.00E+00	0.00E+00	1.66E-08	0.00E+00	0.00E+00	0.00E+00	1.45E-04	0.00E+00	1.45E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,2-Dibromo-3-Chloropropane	96-12-8	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,2-Dibromomethane	106-93-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,2-Dichloroethane	107-06-2	4.06E-08	0.00E+00	0.00E+00	0.00E+00	5.33E-05	0.00E+00	0.00E+00	0.00E+00	5.33E-05	5.33E-05	0.00E+00	0.00E+00	5.33E-05	
1,2-Dichloropropane	78-87-5	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,3-Butadiene	106-99-0	2.42E-07	5.06E-07	2.56E-05	9.41E-06	3.18E-04	4.16E-04	2.25E-01	7.04E-03	2.33E-01	3.18E-04	4.16E-04	1.28E-01	7.04E-03	1.36E-01
1,4-Dichlorobenzene	106-37-6	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
1,4-Dichlorobenzene	106-46-7	2.32E-09	8.36E-09	1.03E-07	0.00E+00	3.05E-06	6.86E-06	9.06E-04	0.00E+00	9.16E-04	3.05E-06	6.86E-06	5.16E-04	0.00E+00	
1,4-Dioxane	123-91-1	0.00E+00	1.67E-07	0.00E+00	0.00E+00	0.00E+00	1.37E-04	0.00E+00	0.00E+00	1.37E-04	0.00E+00	1.37E-04	0.00E+00	1.37E-04	
1,4-Phenylenediamine	106-50-3	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
2,4,5-Trichlorophenol	95-95-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
2,4,6-Trichlorophenol	88-06-2	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
2,4-Dinitrophenol	51-28-5	8.39E-09	8.67E-09	0.00E+00	3.98E-07	1.10E-05	7.12E-06	0.00E+00	2.98E-04	3.17E-04	1.10E-05	7.12E-06	0.00E+00	2.98E-04	3.17E-04
2,4-Dinitrotoluene	121-14-2	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
2-Butanone	78-93-3	3.07E-06	3.17E-06	5.35E-05	1.44E-04	4.03E-03	2.60E-03	4.69E-01	1.08E-01	5.83E-01	4.03E-03	2.60E-03	2.67E-01	1.08E-01	3.82E-01
2-Chloro-1,3-Butadiene	126-99-8	0.00E+00	0.00E+00	9.08E-06	0.00E+00	0.00E+00	0.00E+00	7.96E-02	0.00E+00	7.96E-02	0.00E+00	0.00E+00	4.54E-02	0.00E+00	
2-Chloroacetophenone	532-27-4	2.83E-10	6.48E-09	0.00E+00	1.34E-08	3.72E-07	5.32E-06	0.00E+00	1.01E-05	1.58E-05	3.72E-07	5.32E-06	0.00E+00	1.01E-05	
2-Methylphenol	95-48-7	1.99E-08	4.63E-08	1.17E-07	2.10E-06	2.62E-05	3.80E-05	1.03E-03	1.57E-03	2.66E-03	2.62E-05	3.80E-05	5.87E-04	1.57E-03	
3,3'-Dichlorobenzidine	91-94-1	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
3,3'-Dimethoxybenzidine	119-90-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
3,3'-Dimethylbenzidine	119-93-7	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
4,4'-Methylenedianiline	101-77-9	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
4-Aminobiphenyl	92-67-1	6.99E-11	0.00E+00	0.00E+00	0.00E+00	9.19E-08	0.00E+00	0.00E+00	0.00E+00	9.19E-08	9.19E-08	0.00E+00	0.00E+00	9.19E-08	
4-Methyl-2-Pentanone	108-10-1	1.59E-05	6.73E-06	5.99E-04	1.93E-04	2.09E-02	5.52E-03	5.25E+00	1.44E-01	5.42E+00	2.09E-02	5.52E-03	2.99E+00	1.44E-01	
4-Nitrobiphenyl	92-93-3	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
4-Nitrophenol	100-02-7	5.13E-09	5.30E-09	0.00E+00	2.44E-07	6.74E-06	4.36E-06	0.00E+00	1.83E-04	1.94E-04	6.74E-06	4.36E-06	0.00E+00	1.83E-04	
a,a,a-Trichlorotoluene	98-07-7	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Acetaldehyde	75-07-0	3.61E-07	3.73E-07	1.00E-05	1.71E-05	4.74E-04	3.06E-04	8.78E-02	1.28E-02	1.01E-01	4.74E-04	3.06E-04	5.00E-02	1.28E-02	
Acetaldehyde + Isobutane		3.17E-07	3.28E-07	0.00E+00	0.00E+00	4.17E-04	2.69E-04	0.00E+00	0.00E+00	6.86E-04	4.17E-04	2.69E-04	0.00E+00	6.86E-04	
Acetonitrile	75-05-8	2.40E-07	2.48E-07	5.47E-06	1.14E-05	3.16E-04	2.04E-04	4.80E-02	8.55E-03	5.70E-02	3.16E-04	2.04E-04	2.73E-02	8.55E-03	
Acetophenone	98-86-2	1.20E-06	8.18E-06	4.39E-04	2.13E-04	1.58E-03	6.72E-03	3.86E+00	1.59E-01	4.02E+00	1.58E-03	6.72E-03	2.20E+00	1.59E-01	
Acrolein	107-02-8	4.28E-07	4.42E-07	4.44E-06	2.03E-05	5.62E-04	3.63E-04	3.90E-02	1.52E-02	5.51E-02	5.62E-04	3.63E-04	2.22E-02	1.52E-02	
Acrylonitrile	107-13-1	6.09E-06	6.29E-06	3.02E-05	2.59E-04	8.00E-03	5.17E-03	2.65E-01	1.94E-01	4.72E-01	8.00E-03	5.17E-03	1.51E-01	1.94E-01	
Allyl Chloride	107-05-1	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Aniline	62-53-3	5.32E-06	5.08E-07	1.02E-03	1.26E-05	6.99E-03	4.17E-04	8.91E+00	4.47E-03	8.92E+00	6.99E-03	4.17E-04	5.08E+00	9.47E-03	
Benzene	71-43-2	3.43E-07	3.54E-07	5.62E-06	4.88E-05	4.50E-04	2.91E-04	4.93E-02	3.65E-02	8.66E-02	4.50E-04	2.91E-04	2.81E-02	3.65E-02	
Benzidine	92-87-5	9.34E-09	1.26E-08	4.53E-06	1.95E-08	1.23E-05	1.03E-05	3.98E-02	6.85E-05	3.99E-02	1.23E-05	1.03E-05	2.27E-02	6.85E-05	
Benzyl Chloride	100-44-7	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Biphenyl	92-52-4	4.16E-08	3.02E-08	3.06E-07	3.96E-06	5.47E-05	2.48E-05	2.68E-03	2.97E-03	5.73E-03	5.47E-05	2.48E-05	1.53E-03	2.97E-03	
bis(2-Chloroethyl)ether	111-44-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
bis(2-Ethylhexyl)phthalate	117-81-7	8.63E-07	3.96E-07	1.78E-05	1.01E-05	1.13E-03	3.26E-04	1.56E-01	7.56E-03	1.65E-01	1.13E-03	3.26E-04	8.91E-02	7.56E-03	
Bromoform	75-25-2	1.44E-07	1.49E-07	0.00E+00	6.85E-06	1.90E-04	1.22E-04	0.00E+00	5.13E-03	5.44E-03	1.90E-04	1.22E-04	0.00E+00	5.13E-03	
Bromomethane	74-83-9	2.92E-08	3.01E-08	0.00E+00	1.39E-06	3.83E-05	2.47E-05	0.00E+00	1.04E-03	1.10E-03	3.83E-05	2.47E-05	0.00E+00	1.04E-03	

**Appendix A: Emission Calculations**  
**Company Name: Vibracoustic North America**  
**Address City IN Zip: 1497 Gerber Street, Ligonier, IN 46767**  
**FESOP No.: F113-23616-00023**  
**Reviewer: Michael Hirtler/ EVP**  
**Date: Sep-06**

Emission Unit	Total Max. throughput (lb/hr)
Milling (1 unit)	300
Extruding: (1 unit)	188
Platen Pressing: (61 total units)	0
Oven Curing: (6 total units)	171

**Rubber Processing**  
(page 2 of 2)

Pollutant Name	CAS No.	Maximum Emission Factors, by Operation				Maximum PTE, by Operation					Limited PTE, by Operation								
		Milling		Extruding		Platen Pressing		Oven Curing		Total Maximum PTE	Milling		Extruding		Platen Pressing		Oven Curing		Total Limited PTE
		lb/lb rubber	lb/lb rubber	lb/lb rubber	lb/lb rubber	tpy	tpy	tpy	tpy		tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	
Cadmium (Cd) Compounds		0.00E+00	5.01E-09	0.00E+00	0.00E+00	0.00E+00	4.11E-06	0.00E+00	0.00E+00	4.11E-06	0.00E+00	4.11E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.11E-06	
<b>Carbon Disulfide</b>	75-15-0	5.32E-05	5.49E-09	1.32E-03	1.37E-03	6.98E-02	4.51E-02	1.16E+01	1.03E+00	1.27E+01	6.98E-02	4.51E-02	<b>6.61E+00</b>	1.03E+00	<b>7.75E+00</b>				
Carbon Tetrachloride	56-23-5	2.43E-05	2.51E-05	9.15E-04	2.38E-04	3.19E-02	2.06E-02	8.03E+00	1.78E-01	8.26E+00	3.19E-02	2.06E-02	4.57E+00	1.78E-01	4.80E+00				
Carbonyl Sulfide	463-58-1	1.16E-05	1.20E-05	4.39E-04	1.91E-04	1.53E-02	9.88E-03	3.85E+00	1.43E-01	4.02E+00	1.53E-02	9.88E-03	2.19E+00	1.43E-01	2.36E+00				
Chlorobenzene	108-90-7	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Chloroethane	75-00-3	8.82E-07	9.12E-07	1.48E-06	4.04E-05	1.16E-03	7.49E-04	1.30E-02	3.03E-02	4.52E-02	1.16E-03	7.49E-04	7.39E-03	3.03E-02	3.96E-02				
Chloroform	67-66-3	3.37E-07	3.49E-07	1.27E-05	3.31E-06	4.43E-04	2.86E-04	1.12E-01	2.48E-03	1.15E-01	4.43E-04	2.86E-04	6.36E-02	2.48E-03	6.68E-02				
Chloromethane	74-87-3	4.60E-07	4.75E-07	7.68E-06	2.08E-05	6.04E-04	3.90E-04	6.74E-02	1.56E-02	8.40E-02	6.04E-04	3.90E-04	3.84E-02	1.56E-02	5.50E-02				
Chromium (Cr) Compounds		0.00E+00	2.54E-07	0.00E+00	0.00E+00	0.00E+00	2.08E-04	0.00E+00	0.00E+00	2.08E-04	0.00E+00	2.08E-04	0.00E+00	0.00E+00	2.08E-04				
Cobalt (Co) Compounds		0.00E+00	1.90E-08	0.00E+00	0.00E+00	0.00E+00	1.56E-05	0.00E+00	0.00E+00	1.56E-05	0.00E+00	1.56E-05	0.00E+00	0.00E+00	1.56E-05				
Cumene	98-82-8	1.65E-06	1.82E-06	2.76E-06	7.54E-05	2.16E-03	1.50E-03	2.42E-02	5.65E-02	8.43E-02	2.16E-03	1.50E-03	1.38E-02	5.65E-02	7.39E-02				
Di-n-butylphthalate	84-74-2	1.73E-07	3.65E-07	9.64E-06	8.22E-06	2.27E-04	2.99E-04	8.46E-02	6.16E-03	9.13E-02	2.27E-04	2.99E-04	4.82E-02	6.16E-03	5.49E-02				
Dibenzofuran	132-64-9	1.73E-08	1.83E-08	1.54E-07	3.29E-06	2.27E-05	1.50E-05	1.35E-03	2.46E-03	3.85E-03	2.27E-05	1.50E-05	7.68E-04	2.46E-03	3.27E-03				
Dimethylaminoazobenzene	60-11-7	8.49E-09	8.77E-09	3.20E-07	8.32E-08	1.12E-05	7.20E-06	2.81E-03	6.23E-05	2.89E-03	1.12E-05	7.20E-06	1.60E-03	6.23E-05	1.68E-03				
Dimethylphthalate	131-11-3	7.21E-08	8.43E-09	1.80E-07	3.87E-07	9.48E-05	6.92E-06	1.58E-03	2.90E-04	1.97E-03	9.48E-05	6.92E-06	9.01E-04	2.90E-04	1.29E-03				
Epichlorohydrin	106-89-8	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Ethyl Acrylate	140-88-5	2.45E-06	2.53E-06	0.00E+00	1.16E-04	3.22E-03	2.08E-03	0.00E+00	8.72E-02	9.25E-02	3.22E-03	2.08E-03	0.00E+00	8.72E-02	9.25E-02				
Ethylbenzene	100-41-4	2.24E-06	2.32E-06	5.43E-06	1.06E-04	2.95E-03	1.90E-03	4.76E-02	7.98E-02	1.32E-01	2.95E-03	1.90E-03	2.71E-02	7.98E-02	1.12E-01				
Hexachlorobenzene	118-74-1	0.00E+00	4.98E-09	0.00E+00	2.29E-07	0.00E+00	4.09E-06	0.00E+00	1.71E-04	1.76E-04	0.00E+00	4.09E-06	0.00E+00	1.71E-04	1.76E-04				
Hexachlorobutadiene	87-68-3	0.00E+00	1.72E-07	3.93E-07	0.00E+00	0.00E+00	1.42E-04	3.45E-03	0.00E+00	3.59E-03	0.00E+00	1.42E-04	1.96E-03	0.00E+00	2.11E-03				
Hexachlorocyclopentadiene	77-47-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Hexachloroethane	67-72-1	6.39E-07	6.60E-07	2.41E-05	6.26E-06	8.39E-04	5.42E-04	2.11E-01	4.69E-03	2.17E-01	8.39E-04	5.42E-04	1.20E-01	4.69E-03	1.26E-01				
Hexane	110-54-3	5.85E-05	6.05E-05	3.00E-04	2.78E-03	7.69E-02	4.97E-02	2.63E+00	2.08E+00	4.83E+00	7.69E-02	4.97E-02	1.50E+00	2.08E+00	3.70E+00				
Hydroquinone	123-31-9	1.36E-05	1.41E-05	1.58E-05	4.11E-06	1.79E-02	1.16E-02	1.39E-01	3.08E-03	1.71E-01	1.79E-02	1.16E-02	7.91E-02	3.08E-03	1.12E-01				
Isocetane	540-84-1	4.12E-07	4.12E-07	4.81E-06	1.89E-05	5.41E-04	3.39E-04	4.22E-02	1.42E-02	5.73E-02	5.41E-04	3.39E-04	2.40E-02	1.42E-02	3.91E-02				
Isophorone	78-59-1	1.12E-05	3.55E-07	1.16E-06	1.63E-05	1.47E-02	2.92E-04	1.02E-02	1.22E-02	3.74E-02	1.47E-02	2.92E-04	5.80E-03	1.22E-02	3.31E-02				
Lead (Pb) Compounds		0.00E+00	1.09E-08	0.00E+00	0.00E+00	0.00E+00	8.92E-06	0.00E+00	0.00E+00	8.92E-06	0.00E+00	8.92E-06	0.00E+00	0.00E+00	8.92E-06				
m-Xylene	108-38-3	0.00E+00	0.00E+00	0.00E+00	1.33E-06	0.00E+00	0.00E+00	0.00E+00	9.96E-04	9.96E-04	0.00E+00	0.00E+00	0.00E+00	9.96E-04	9.96E-04				
m-Xylene + p-Xylene		7.47E-06	7.72E-06	1.73E-05	3.52E-04	9.82E-03	6.34E-03	1.51E-01	2.63E-01	4.31E-01	9.82E-03	6.34E-03	8.63E-02	2.63E-01	3.66E-01				
Methylene bis-chloroaniline	101-14-4	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Methylene Chloride	75-09-2	8.58E-06	2.07E-05	4.87E-05	9.50E-04	1.13E-02	1.70E-02	4.27E-01	7.11E-01	1.17E+00	1.13E-02	1.70E-02	2.43E-01	7.11E-01	9.83E-01				
N,N-Dimethylaniline	121-69-7	0.00E+00	5.45E-09	0.00E+00	1.26E-06	0.00E+00	4.47E-06	0.00E+00	9.44E-04	9.48E-04	0.00E+00	4.47E-06	0.00E+00	9.44E-04	9.48E-04				
N-Nitrosodimethylamine	62-75-9	1.21E-09	0.00E+00	0.00E+00	0.00E+00	1.59E-06	0.00E+00	0.00E+00	0.00E+00	1.59E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.59E-06				
N-Nitrosodimethylamine	86-30-6	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
N-Nitrosomorpholine	59-89-2	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Naphthalene	91-20-3	3.73E-07	1.96E-06	4.04E-06	7.01E-06	4.90E-04	1.61E-03	3.54E-02	5.25E-03	4.28E-02	4.90E-04	1.61E-03	2.02E-02	5.25E-03	2.75E-02				
Nickel (Ni) Compounds		0.00E+00	4.91E-07	0.00E+00	0.00E+00	0.00E+00	4.03E-04	0.00E+00	0.00E+00	4.03E-04	0.00E+00	4.03E-04	0.00E+00	0.00E+00	4.03E-04				
Nitrobenzene	98-95-3	1.05E-08	1.08E-08	0.00E+00	4.97E-07	1.38E-05	8.88E-06	0.00E+00	3.72E-04	3.95E-04	1.38E-05	8.88E-06	0.00E+00	3.72E-04	3.95E-04				
o-Anisidine	90-04-0	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
o-Toluidine	95-53-4	1.16E-07	1.50E-07	4.36E-06	2.03E-06	1.52E-04	1.23E-04	3.83E-02	1.52E-03	4.01E-02	1.52E-04	1.23E-04	2.18E-02	1.52E-03	2.36E-02				
o-Xylene	95-47-6	4.01E-06	4.14E-06	1.86E-05	1.89E-04	5.27E-03	3.40E-03	1.63E-01	1.41E-01	3.13E-01	5.27E-03	3.40E-03	9.30E-02	1.41E-01	2.43E-01				
p-Xylene	106-42-3	0.00E+00	0.00E+00	0.00E+00	2.53E-05	0.00E+00	0.00E+00	0.00E+00	1.90E-02	1.90E-02	0.00E+00	0.00E+00	0.00E+00	1.90E-02	1.90E-02				
Pentachloronitrobenzene	82-68-8	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Pentachlorophenol	87-86-5	6.49E-09	6.70E-09	0.00E+00	3.08E-07	8.53E-06	5.51E-06	0.00E+00	2.31E-04	2.45E-04	8.53E-06	5.51E-06	0.00E+00	2.31E-04	2.45E-04				
Phenol	108-95-2	6.58E-07	6.80E-07	2.67E-06	3.13E-05	8.65E-04	5.59E-04	2.34E-02	2.34E-02	4.82E-02	8.65E-04	5.59E-04	1.33E-02	2.34E-02	3.82E-02				
Propanal	123-38-6	1.72E-06	1.78E-06	0.00E+00	8.19E-05	2.27E-03	1.46E-03	0.00E+00	6.14E-02	6.51E-02	2.27E-03	1.46E-03	0.00E+00	6.14E-02	6.51E-02				
Propylene Oxide	75-56-9	3.61E-06	3.73E-06	1.04E-04	1.72E-04	4.75E-03	3.07E-03	9.11E-01	1.28E-01	1.05E+00	4.75E-03	3.07E-03	5.19E-01	1.28E-01	6.55E-01				
Styrene	100-42-5	2.20E-06	7.25E-07	8.31E-05	2.16E-05	2.90E-03	5.95E-04	7.29E-01	1.62E-02	7.49E-01	2.90E-03	5.95E-04	4.15E-01	1.62E-02	4.35E-01				
Substituted Quinoline	91-22-5	0.00E+00	0.00E+00	0.00E+00	1.23E-04	0.00E+00	0.00E+00	0.00E+00	9.24E-02	9.24E-02	0.00E+00	0.00E+00	0.00E+00	9.24E-02	9.24E-02				
t-Butyl Methyl Ether	1634-04-4	4.14E-06	4.28E-06	1.56E-04	4.06E-05	5.44E-03	3.51E-03	1.37E+00	3.04E-02	1.41E+00	5.44E-03	3.51E-03	7.80E-01	3.04E-02	8.20E-01				
Tetrachloroethene	127-18-4	9.91E-07	2.20E-06	1.36E-05	1.01E-04	1.30E-03	1.80E-03	1.19E-01	7.56E-02	1.98E-01	1.30E-03	1.80E-03	6.79E-02	7.56E-02	1.47E-01				
Toluene	108-88-																		

## Appendix A: Emission Calculations

**Company Name:** Vibracoustic North America  
**Address City IN Zip:** 1497 Gerber Street, Ligonier, IN 46767  
**FESOP No.:** F113-23616-00023  
**Reviewer:** Michael Hirtler/ EVP  
**Date:** Sep-06

### Rubber Post-Curing

#### General Information:

PM/PM10 Oven Curing Emission Factor, lb/lb rubber cured (a)	0.000675
Potential Rubber Post-Cured, lbs/yr	1,497,960

#### Emissions:

Pollutant	Oven Curing PM Emissions tons/year
Potential Emissions	0.51

(a) Emission factor provided by source for similar facility at their Morristown, IN plant, based on material balance, i.e., 30 lb rubber collected at ESP/month for a 12-month period; 533,600 lb rubber cured/12-month period; and 99.9% ESP efficiency)

#### Methodology:

PTE PM/PM10 (tpy) = max. throughput rate (lb/year) x emission factor (lb/lb) x 1ton/2000 lb

#### Example Calculations:

Uncontrolled Oven Curing Emissions =

(Emission Factor, lbs/lb rubber x Quantity Cured, lbs)/2,000

No control is used for oven curing emissions

VOC/HAP emissions for post-curing presented on page 7 of Appendix A.

## Appendix A: Emission Calculations

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### Extruder Releases

**Source Information:**

2005 Rubber Coated, lbs	520,310
2005 Rubber Using Mold Release, lbs	816,174
Maximum Rubber Extruded, lbs/yr	1,642,500

**Actual Emission Calculations:**

Materials Used	Annual Usage (1) gallons	Material Density lbs/gal	Annual Usage pounds	VOC Content wt. %	VOC Emissions tpy
Diamondkote W-51 (mold release)	52	8.34	434	0.0	0.00
Quikote CLM Wet (rubber coating)	110	<u>8.34</u>	917	20.0	0.09
				<b>Total:</b>	<b>0.09</b>

**Potential Emission Calculations:**

Materials Used	Usage Factor (a) lb/lb rubber	Maximum Rubber Extruded pounds	Maximum Annual Usage pounds	VOC Content wt. %	VOC Emissions tpy
Diamondkote W-51 (mold release)	0.000531	1,642,500	873	0.0	0.00
Quikote CLM Wet (rubber coating)	0.001763	1,642,500	2,896	20.0	0.29
				<b>Total:</b>	<b>0.29</b>

(a) Usage factor calculated based on 2005 material usage and quantity of rubber extruded  
 PTE (tpy) = usage factor (lb/lb rubber) x potential rubber extruded (lb/yr) x wt. % VOC x ton/2000 lb

## Appendix A: Emission Calculations

**Company Name:** Vibracoustic North America  
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**Date:** Sep-06

### Rubber Processing, Mold Release Usage

**Source Information:**

2005 Rubber Pressed, lbs	2,859,708
Maximum Rubber Pressed, lbs/yr	17,546,103
Mold Release Usage Factor, lb/lb rubber (a)	0.038120
Proposed Pressing Limit, lbs/yr	10,000,000

**Potential Emission Calculations:**

Materials Used	Usage Factor lb/lb rubber	Maximum Rubber Pressed lbs	Maximum Usage pounds	VOC Content wt. %	VOC Emissions tpy
Monocoat 1021W	0.038120	17,546,103	668,858	2.0	6.689
Frekote R-120	0.038120	17,546,103	668,858	0.0	0.000
Diamondkote 3284W	0.038120	17,546,103	668,858	0.0	0.000
<b>WORST CASE MOLD RELEASE:</b>					<b>6.69</b>

**Limited Pressing Emission Calculations:**

Materials Used	Usage Factor lb/lb rubber	Limited Rubber Pressed lbs	Maximum Usage pounds	VOC Content wt. %	VOC Emissions tpy
Monocoat 1021W	0.038120	10,000,000	381,200	2.0	3.812
Frekote R-120	0.038120	10,000,000	381,200	0.0	0.000
Diamondkote 3284W	0.038120	10,000,000	381,200	0.0	0.000
<b>WORST CASE MOLD RELEASE:</b>					<b>3.81</b>

(a) Usage factor calculated based on 2005 material usage and quantity of rubber pressed  
 PTE (tpy) = usage factor (lb/lb rubber) x potential rubber extruded (lb/yr) x wt. % VOC x ton/2000 lb

## Appendix A: Emission Calculations

**Company Name:** Vibracoustic North America  
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### Wabash Assembly Press\*

Parameter	Basis
Surface area of the tank = 6.25 sq ft (5,806 sq cm)	Walkthrough
Molecular weight of fluid = 66.2 lb/lbmole	Engineering Calculation (Worst Case)
Vapor pressure of fluid = 0.15 mm Hg	Plurasafe MSDS (Worst Case)
Temperature = 20 degrees Celsius	Assumption - indoor temp.
Hours per year fluid exposed = 8,760	Actual and Maximum

**Emission Calculation Methodology:**

Apply Clement's Vaporization Model

$$W = \frac{(6.84 \text{ E-}05) \times ((M)^{(2/3)}) \times (A) \times (VP)}{(R) \times (T + 273)}$$

Where: W = vapor generation rate, lbs/min  
 M = molecular weight, lbs/lbmole  
 A = material surface area, sq cm  
 VP = vapor pressure, mmHg at T  
 R = 82.05 atm cu cm/g mol K  
 T = material temperature, degrees C

$$W = \frac{(6.84 \text{ E-}05) \times ((66.2)^{(2/3)}) \times (5,806) \times (0.15)}{(82.05) \times (20 + 273)}$$

W = 4.05E-05    lb VOC/min/press  
 = 21.31        lb VOC/year/press  
 = 1.07E-02    tpy VOC/press

**NOTES:**

Assume the worst case, i.e., 100% of the VOC is ethylene glycol  
 Actual emissions = potential emissions (hrs fluid exposed is the same for both)  
 \*This is a machine which contains an enclosed bath of glycol material used to fill wet motor mounts. The bath is not heated, mechanically agitated.

## Appendix A: Emission Calculations

**Company Name:** Vibracoustic North America  
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### Four (4) Final Coat Spray Booths - Insignif. Activity

**Emission Calculations:**

	Annual Usage (a)	Material Density (b)	Annual Usage (c)	Material Composition (b)				Emissions (c)			
				VOC	Diethylene Glycol Monobutyl Ether	Ethylene Glycol	Solids	VOC	Diethylene Glycol Monobutyl Ether	Ethylene Glycol	Solids
	gallons	lbs/gal	pounds	wt. %	wt. %	wt. %	wt. %	tpy	tpy	tpy	tpy
<b>Potential (per booth) (a):</b>											
Kalcor Black 94-91110	1,577	10.75	16,955	6.5	1.7	1.0	53.5	0.55	0.14	0.08	1.13
Kalcor Blue 94-82887	1,577	11.30	17,819	3.3	0.0	0.0	53.5	0.30	0.00	0.00	1.19
Kalcor Yellow 94-42838	1,577	11.50	18,127	3.8	0.0	0.0	54.7	0.35	0.00	0.00	1.24
<b>Maximum per Booth, worst case coating:</b>								<b>0.55</b>	<b>0.14</b>	<b>0.08</b>	<b>1.24</b>
<b>Maximum for 4 Booths, worst case coating:</b>								<b>2.20</b>	<b>0.58</b>	<b>0.34</b>	<b>4.96</b>

**Methodology:**

- (a) Maximum usage = 60 pieces/hour capacity x 0.003 gallons/piece x 8,760 hours/year = 1,577 gallons/year per AA 113-18877-00023, issued on May 12, 2004 for installation of the first 3 units
- (b) Formulation data from MSDSs dated 1/5/01 (most recent) - Black 94-91110, 8/18/05 - Blue 94-82887, and 1/17/05 - Yellow 94-92838. VOC data e-mailed by Carol McGee of Kalcor Coatings 8/29/06.  
Ethylene glycol is a HAP, diethylene glycol monobutyl ether is a HAP (glycol ether category)  
Ethylene glycol n-butyl ether has been delisted as a glycol ether HAF
- (c) Potential VOC, HAP (tpy) = max. coating usage (lb/yr) x wt. % VOC, HAP x 1 ton/2000 lb  
Potential PM (tpy) = max. coating usage (lb/yr) x wt. % solids x (1-trans. Efficiency of 75% ) x 1 ton/2000 lb

**Appendix A: Emission Calculations**

Company Name: Vibracoustic North America  
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 FESOP No.: F113-23616-00023  
 Reviewer: Michael Hirtler/ EVP  
 Date: Sep-06

**Natural Gas-Fired Equipment  
 Potential Emissions**

Unit	Btu rating MMBtu/hr	Max. Gas Usage (mmcf/yr)	Emission Factors (a)							Emissions						
			PM lb/mmcf	PM-10 lb/mmcf	NOx lb/mmcf	SOx lb/mmcf	VOC lb/mmcf	CO lb/mmcf	Total HAP lb/mmcf	PM (tpy)	PM-10 (tpy)	NOx (tpy)	SOx (tpy)	VOC (tpy)	CO (tpy)	Total HAP (tpy)
Jenfab Washer	1.000	8.76	7.6	7.6	100	0.6	5.5	84	1.88	0.033	0.033	0.438	0.003	0.024	0.368	0.008
Spaceheater #1	0.200	1.75	7.6	7.6	94	0.6	5.5	40	1.88	0.007	0.007	0.082	0.001	0.005	0.035	0.002
Spaceheater #2	0.200	1.75	7.6	7.6	94	0.6	5.5	40	1.88	0.007	0.007	0.082	0.001	0.005	0.035	0.002
Spaceheater #3	0.200	1.75	7.6	7.6	94	0.6	5.5	40	1.88	0.007	0.007	0.082	0.001	0.005	0.035	0.002
Spaceheater #4	0.200	1.75	7.6	7.6	94	0.6	5.5	40	1.88	0.007	0.007	0.082	0.001	0.005	0.035	0.002
HVAC Unit #3	0.100	0.88	7.6	7.6	94	0.6	5.5	40	1.88	0.003	0.003	0.041	0.000	0.002	0.018	0.001
HVAC Unit #4	0.100	0.88	7.6	7.6	94	0.6	5.5	40	1.88	0.003	0.003	0.041	0.000	0.002	0.018	0.001
HVAC Unit #6	0.140	1.23	7.6	7.6	94	0.6	5.5	40	1.88	0.005	0.005	0.058	0.000	0.003	0.025	0.001
HVAC Unit #8	0.300	2.63	7.6	7.6	100	0.6	5.5	84	1.88	0.010	0.010	0.131	0.001	0.007	0.110	0.002
HVAC Unit #9	0.100	0.88	7.6	7.6	94	0.6	5.5	40	1.88	0.003	0.003	0.041	0.000	0.002	0.018	0.001
Furnace	0.200	1.75	7.6	7.6	94	0.6	5.5	40	1.88	0.007	0.007	0.082	0.001	0.005	0.035	0.002
Wall AMU - 55 mcfm	4.400	38.54	7.6	7.6	100	0.6	5.5	84	1.88	0.146	0.146	1.927	0.012	0.106	1.619	0.036
Wall AMU - 30 mcfm	2.750	24.09	7.6	7.6	100	0.6	5.5	84	1.88	0.092	0.092	1.205	0.007	0.066	1.012	0.023
Wall Inlet - 4' x 4'	3.080	26.98	7.6	7.6	100	0.6	5.5	84	1.88	0.103	0.103	1.349	0.008	0.074	1.133	0.025
<b>TOTALS:</b>	<b>12.970</b>	<b>113.617</b>								<b>0.432</b>	<b>0.432</b>	<b>5.643</b>	<b>0.034</b>	<b>0.312</b>	<b>4.494</b>	<b>0.107</b>

**Notes:**

(a) AP-42, Section 1.4 (7/98) for small boilers/residential furnaces, depending on heat input of unit

Misc. Fuel variables used in calculations:

Gas heat value, Btu/cuft      1,000 AP-42 Default

## Appendix A: Emission Calculations

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### One (1) Parts Washer

#### Source Information:

Solvent Used	<u>Safety Kleen 150</u>	Ft. Wayne, IN Safety Kleen office
Solvent Density, lbs/gallon	<u>6.65</u>	MSDS Sheet
VOC Content, %	<u>100</u>	MSDS Sheet

#### Emission Calculations:

Potential VOC Emissions = 0.33 tons/year solvent emitted/unit x 1 cold cleaner = 0.33 tons solvent emitted/yr  
(Model 81 Unit) 0.33 lbs solvent emitted x 100 % VOC = **0.33 tons VOC emitted/yr**  
=

#### Notes

Emission factor (tons/year solvent emitted/unit) taken from AP-42, Section 4.6, 1/1995 for cold cleaner.