



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
MC 61-53 IGCN 1003  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: September 10, 2007  
RE: Nishikawa Standard Company / 087-25082-00031  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

---

*Mitchell E. Daniels, Jr.*  
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September 10, 2007

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

Re: 087-25082-00031  
First Administrative Amendment to  
Part 70 Renewal T087-21424-00031

Dear Mr. Hough:

Nishikawa Standard Company was issued a Part 70 permit renewal on April 17, 2006 for a secondary aluminum production facility. An application requesting an administrative amendment was received on August 1, 2007. The provisions of rule 326 IAC 2-7-11(a)(7) & (8) state that an administrative amendment can be used for changes that revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term and can also be used to incorporate an insignificant activity or exempted unit. Pursuant to that rule, the permit is hereby administratively amended as shown in the attached technical support document (TSD).

All other conditions of the permit shall remain unchanged and in effect. Please find enclosed the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jamal Naas, at (800) 451-6027, and ask for Jamal Naas or extension (4-5176), or dial (317) 234-5176.

Sincerely,

*Original signed by*  
Matthew W. Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

Attachments

JNN

cc: File – LaGrange County  
U.S. EPA, Region V  
LaGrange County Health Department  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

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

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

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

First Administrative Amendment No.: 087-23608-00031	Affected Pages: Entire Permit
Issued by: <i>Original signed by</i> Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: September 10, 2007  Expiration Date: April 7, 2011

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

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

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

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

- (a) One (1) Line 2 spray booth, identified as emission unit X029, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (b) One (1) Line 3 spray booth coating extruded rubber parts, identified as emission unit X030, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit X031, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (d) One (1) Line 6 spray booth, identified as X032, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) Two (2) CV finishing touchup stations coating extruded rubber parts, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.

- (f) One (1) SDM EB silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators coating extruded rubber parts and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (g) One (1) urethane application line (CV Line 9), identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (h) One (1) SDM EC urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns coating extruded rubber parts and one (1) blown air dryer, one (1) 1.0 million British thermal unit per hour natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (i) One (1) urethane application line (Line 8), identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (j) One (1) Line 4 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X026, constructed in 2001, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (k) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X027, constructed in 2001, equipped with spray guns and dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (l) One (1) waterborne urethane coating booth (Small Robot #1) coating extruded rubber parts, identified as emission unit X028, constructed in 1999, equipped with spray guns and dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (m) One (1) spray line identified as X034 (SDM-ED Line), constructed in 2002, equipped with six (6) High Volume Low Pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 million British thermal unit per hour exhausting to stacks PEF-E4 and PEF-E5.
- (n) One (1) surface coating line (Small Robot #2), identified as X003, constructed in 2004, including:
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun coating extruded rubber parts, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2; and
  - (2) one (1) electric curing oven.
- (o) Line 10 comprised of the following:
  - (1) One (1) spray line, identified as X039, constructed in 2004, equipped with four (4) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.

- (2) One (1) spray line, identified as X040, constructed in 2004, equipped with two (2) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun; and
- (3) One (1) infrared cure oven at spray lines X039 and X040, exhausting to Stack PEF-A31.
- (p) One (1) spray line, identified as X036 (SDM-EE Line), constructed in 2002, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, exhausting to Stacks PEF-E11 and PEF-E12, respectively, capacity: 10 grams per minute of coating per gun.
- (q) One (1) spray line, identified as X037 (SDM-EA Line), constructed in 2004, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 million British thermal unit per hour each and exhausting to stacks PEF-B11 and PEF-B12.
- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
  - (1) Two (2) continuous surface coating operations:
    - (a) One (1) L-Coat Glassline Spray Booth, identified as LCSB-01, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation began in December 2006; and
    - (b) One (1) L-Coat Glassline Spray Booth, identified as LCSB-02, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S02. Construction of the surface coating operation is scheduled to begin in 2007; and
  - (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners began in December 2006.
- (s) Four (4) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping, described as follows:
  - (1) One (1) booth, identified as GMX, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack GMX;
  - (2) One (1) booth, identified as SEPA/SHJ, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SEPA;
  - (3) One (1) booth, identified as SJC, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SJC; and
  - (4) One (1) booth, identified as SHJ Slide, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SHJ.

- (t) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
  - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders began in December 2006;
  - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders began in December 2006; and
  - (3) Nine (9) natural gas-fired burners:
    - (a) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners, identified as LCEL-01 through LCEL-04, respectively. Construction of the burners began in December 2006; and
    - (b) Five (5) natural gas-fired burners, identified as LCEL-05 through LCEL-09, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S05 through LCEL-S09, respectively. Construction of the burners is scheduled to begin in 2007.
- (u) One (1) CV extrusion line (CV line 1), identified as emission unit X005, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line (CV line 2), identified as emission unit X006, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line (CV line 3), identified as emission unit X007, constructed in 1987, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line (CV line 4), identified as emission unit X008, constructed in 1988, equipped with extruders, strip feeders, and one (1) duster controlled by one (1) dust collector (DC-1) vented internally, curing ovens, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace both exhausting to stack PEF-A3, and one (1) 0.298 million British thermal units per hour natural gas-fired pre-heater exhausting to stack PEF-A2, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (y) One (1) CV extrusion line (CV line 5), identified as emission unit X009, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A10, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-

A18, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.

- (z) One (1) CV extrusion line (CV line 6), identified as emission unit X010, constructed in 1989, equipped with extruders, strip feeders, and two (2) dusters controlled by one (1) dust collector (DC-2) vented internally, curing ovens exhausting to stack PEF-A15, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (aa) One (1) CV extrusion line (CV line 7), identified as emission unit X011, constructed in 1991, equipped with three (3) extruders, and one (1) duster vented internally, one (1) curing oven exhausting to stack PEF-A5, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace exhausting to stack PEF-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (bb) One (1) CV extrusion line (CV line 8), identified as emission unit X012, constructed in 1995, equipped with four (4) extruders and four (4) strip feeders vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (cc) One (1) CV extrusion line (CV line 9), identified as emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, and one (1) duster controlled by one (1) dust collector (DC-3) vented internally, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (dd) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 2004, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens with a maximum heat input rate 0.143 million British thermal units per hour each, exhausting to vents PEV-B7 and PEV-B9, two (2) natural gas-fired hot air rubber curing ovens with a maximum heat input rate of 0.850 million British thermal unit per hour each, exhausting to vents PEV-B6 and PEF-B3, four (4) extruders, four (4) strip feeders, one (1) plasma arc generator, and one (1) wire metal system consisting of two (2) natural gas-fired burners with a maximum heat input rate of 0.375 million British thermal unit per hour each, and exhausting to vent PEF-B9.
- (ee) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (ff) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50

pounds of carrier per hour.

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

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

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

- (a) Tumblers [326 IAC 6-3]
- (b) Dango Mixing Mills B and F, each with a dispersion system, using particulate filters as control [326 IAC 6-3]
- (c) Color Mixing Mill [326 IAC 6-3]

- (d) SDM Finishing Drill and Fastener Insetter Units [326 IAC 6-3]
- (e) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (f) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (g) Dango Barwell Extruders [326 IAC 6-3]
- (h) Polymer Block Cutting Station [326 IAC 6-3]
- (i) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (j) Weld Shop Equipment [326 IAC 6-3]
- (k) Silicone Coating Mixing Station [326 IAC 6-3]
- (l) Die Room Metalworking Equipment [326 IAC 6-3]
- (m) SDM Mezzanine Units [326 IAC 6-3]
- (n) Barwell Warm-Up Mill [326 IAC 6-3]

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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

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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 2-7-7]

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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 2-7-5(5)]

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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 2-7-5(6)(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 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

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

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

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

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

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to

whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

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

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

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

### C.7 Performance Testing [326 IAC 3-6]

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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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to

noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Line 2 spray booth, identified as emission unit X029, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (b) One (1) Line 3 spray booth coating extruded rubber parts, identified as emission unit X030, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit X031, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (d) One (1) Line 6 spray booth, identified as X032, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) Two (2) CV finishing touchup stations coating extruded rubber parts, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (f) One (1) SDM EB silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators coating extruded rubber parts and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (g) One (1) urethane application line (CV Line 9), identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (h) One (1) SDM EC urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns coating extruded rubber parts and one (1) blown air dryer, one (1) 1.0 million British thermal unit per hour natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (i) One (1) urethane application line (Line 8), identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (j) One (1) Line 4 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X026, constructed in 2001, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (k) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as emission unit X027, constructed in 2001, equipped with spray guns and dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.

- (l) One (1) waterborne urethane coating booth (Small Robot #1) coating extruded rubber parts, identified as emission unit X028, constructed in 1999, equipped with spray guns and dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (m) One (1) spray line identified as X034 (SDM-ED Line), constructed in 2002, equipped with six (6) High Volume Low Pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 million British thermal unit per hour exhausting to stacks PEF-E4 and PEF-E5.
- (n) One (1) surface coating line (Small Robot #2), identified as X003, constructed in 2004, including:
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun coating extruded rubber parts, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2; and
  - (2) one (1) electric curing oven.
- (o) Line 10 comprised of the following:
  - (1) One (1) spray line, identified as X039, constructed in 2004, equipped with four (4) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun.
  - (2) One (1) spray line, identified as X040, constructed in 2004, equipped with two (2) high volume low pressure (HVLP) spray guns coating extruded rubber parts and dry filters as control, exhausting to Stack PEF-A14, capacity: 10 grams of coating per minute per gun; and
  - (3) One (1) infrared cure oven at spray lines X039 and X040, exhausting to Stack PEF-A31.
- (p) One (1) spray line, identified as X036 (SDM-EE Line), constructed in 2002, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls and exhausting to Stack PEF-E10, with two (2) 0.340 million British thermal unit per hour natural gas-fired coating cure ovens, exhausting to Stacks PEF-E11 and PEF-E12, respectively, capacity: 10 grams per minute of coating per gun.
- (q) One (1) spray line, identified as X037 (SDM-EA Line), constructed in 2004, equipped with six (6) high volume low pressure (HVLP) spray guns coating extruded rubber parts, using dry filters to control PM overspray emissions, and exhausting to stack PEF-B10, and two (2) natural gas-fired coating cure ovens rated at 0.340 million British thermal unit per hour each and exhausting to stacks PEF- B11 and PEF-B12.
- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
  - (1) Two (2) continuous surface coating operations:
    - (a) One (1) L-Coat Glassline Spray Booth, identified as LCSB-01, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation began in December 2006; and

- (b) One (1) L-Coat Glassline Spray Booth, identified as LCSB-02, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S02. Construction of the surface coating operation is scheduled to begin in 2007; and
  - (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners began in December 2006.
  - (s) Four (4) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping, described as follows:
    - (1) One (1) booth, identified as GMX, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack GMX;
    - (2) One (1) booth, identified as SEPA/SHJ, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SEPA;
    - (3) One (1) booth, identified as SJC, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SJC; and
    - (4) One (1) booth, identified as SHJ Slide, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SHJ.
  - (t) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
    - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders began in December 2006;
    - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders began in December 2006; and
    - (3) Nine (9) natural gas-fired burners:
      - (a) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners began in December 2006.
      - (b) Five (5) natural gas-fired burners, identified as LCEL-05 through LCEL-09, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S05 through LCEL-S09, respectively. Construction of the burners is scheduled to begin in 2007.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

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

Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the one (1) silicone application line (X019) shall be as follows:

- (1) The total VOC usage at the four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, and two (2) spray lines (X-039 and X-040) shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month.
- (2) All coating, urethane and silicone application devices at these facilities shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (3) All VOC containing containers shall be kept covered when not in use.

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

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The total VOC usage at the four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, two (2) spray lines (X-039 and X-040), the L-Coat Glassline spray booth and L-Coat Extrusion Line (four plastic extruders and three rubber extruders), shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. Emissions from these surface coating operations in combination with uncontrolled potential VOC emissions of 96.47 tons per year from extruding and curing operations (except the L-Coat Extrusion Line), 1.90 tons per year from mixing and milling, 0.892 tons per year from insignificant activities that include four (4) surface coating spray booths identified as GMX, SEPA/SHJ, SJC and SHJ Slide and 1.30 tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year.

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

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

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

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

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

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC)**

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

**D.1.6 VOC Emissions**

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Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound for the most recent twelve (12) month period.

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

### **D.1.7 Record Keeping Requirements**

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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 (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.8 Reporting Requirements**

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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 address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

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

- (3) One (1) wire metal system, consisting of two (2) natural gas-fired burners, exhausting to stack PEF-E9, capacity: 0.375 million British thermal unit per hour, each.
- (ii) One (1) CV extrusion line (CV Line 10), identified as X038, constructed in 2004, with a maximum capacity of 750 pounds of rubber per hour, consisting of:
  - (1) Two (2) natural gas-fired microwave curing ovens, exhausting to Stack PEF-A11, heat input capacity: 0.25 million British thermal units per hour, each.
  - (2) Six (6) electric heaters, exhausting to Stack PEF-A11, capacity: 3 kilowatt hours, each.
  - (3) Two (2) natural gas-fired hot air rubber curing ovens, exhausting to Stack PEF-A12, heat input capacity: 0.40 million British thermal units per hour, each.
  - (4) One (1) plasma arc generator, consisting of one (1) electric generator, exhausting to Stack PEF-A13, capacity: 1.2 kilowatt hours.
  - (5) Three (3) extruders and three (3) strip feeders.

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

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

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

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

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

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

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

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

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

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

#### Compliance Determination Requirements

##### D.3.2 Particulate Matter (PM)

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

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

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

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
<input checked="" type="checkbox"/> 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
<input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <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

### Part 70 Quarterly Report

Source Name: Nishikawa Standard Company  
 Source Address: 324 Morrow Street, Topeka, Indiana 46571  
 Mailing Address: Same as above  
 Part 70 Permit No.: T087-21424-00031  
 Facilities: Four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, the two (2) spray lines (X-039 and X-040), the L-Coat Glassline Spray Booth, and the extrusion line (four plastic extruders and three rubber extruders) described in permit Section D.1.1.

Parameter: Total Volatile Organic Compounds (VOC) Usage  
 Limit: Less than 148 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month (tons)	Total VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

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

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

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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 Part 70 Administrative  
Amendment

**Source Description and Location**

<b>Source Name:</b>	<b>Nishikawa Standard Company</b>
<b>Source Location:</b>	<b>324 Morrow Street, Topeka, IN 46571</b>
<b>County:</b>	<b>LaGrange</b>
<b>SIC Code:</b>	<b>3061</b>
<b>Operating Permit No.:</b>	<b>T087-21424-00031</b>
<b>Operation Permit Issuance Date:</b>	<b>April 17, 2006</b>
<b>Administrative Amendment No.:</b>	<b>087-25082-00031</b>
<b>Permit Reviewer:</b>	<b>Jamal Naas</b>

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

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T 087-21424-00031 on April 17, 2006. The source has since received the following approvals:

- (a) First Significant Permit Modification No. 087-23608-00031, issued on December 22, 2006.
- (b) First Minor Source Modification No. 087-23516-00031, issued on October 20, 2006.

**County Attainment Status**

The source is located in LaGrange County.

<b>Pollutant</b>	<b>Status</b>
PM	attainment
PM <sub>10</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 revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) LaGrange County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (d) LaGrange County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Source Status</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	75.91
PM <sub>10</sub>	76.90
SO <sub>2</sub>	0.10
VOC	<250
CO	14.69
NO <sub>x</sub>	17.49

- (a) This existing source is a minor stationary source, under PSD (326 IAC 2-2), because VOC emissions are limited to less than 250 tons per year and all other regulated pollutants are emitted at a rate of less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the calculated emissions for Part 70 Operating Permit No.T087-21424-00031, issued on April 17, 2006.

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

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

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

### Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM <sub>2.5</sub>	3.0
PM <sub>10</sub>	3.0
SO <sub>2</sub>	0.0
VOC	33.0
CO	1.0
NO <sub>x</sub>	3.0
HAPs	Not reported

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Nishikawa Standard Company on August 1, 2007, relating to the addition of four (4) spray booths to the Continuous Rubber Surface Coating Line and five (5) natural gas-fired burners. The following is a list of the proposed new emission units:

#### Continuous Rubber Surface Coating Line -

- (a) Four (4) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping, described as follows:
- (1) One (1) booth, identified as GMX, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack GMX;
  - (2) One (1) booth, identified as SEPA/SHJ, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SEPA;
  - (3) One (1) booth, identified as SJC, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SJC; and
  - (4) One (1) booth, identified as SHJ Slide, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SHJ.

#### Extrusion Line -

- (a) Five (5) natural gas-fired burners, identified as LCEL-05 through LCEL-09, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S05 through LCEL-S09, respectively.

In addition, the Permittee has requested that the Title of the Responsible Official in Section A.1 of the permit be revised.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

**Permit Level Determination – Part 70**

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

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

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	3.56
PM <sub>10</sub>	3.66
SO <sub>2</sub>	0.010
VOC	0.982
CO	0.900
NO <sub>x</sub>	1.44

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
TOTAL HAPs	less than 0.982

This modification is subject to 326 IAC 2-7-11(a)(7), 326 IAC 2-7-11(a)(8)(A) and 326 IAC 2-7-11(a)(8)(B) [Administrative Permit Amendment]. An administrative permit amendment is a Part 70 permit revision that does any of the following:

- (1) Revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term.
- (2) Incorporates an exempt unit as described in 326 IAC 2-1.1-3; or
- (3) Incorporates an insignificant activity as defined in 326 IAC 2-7-1(21).

Permit condition D.1.2 limits VOC emissions from various processes to 249.58 tons per year to render the requirements of 326 IAC 2-2 (PSD) not applicable. This amendment allows the addition of four (4) surface coating booths and five (5) natural gas-fired burners, which have an uncontrolled potential to emit (PTE) of 0.98 tons of VOC per year and 0.09 tons of VOC per year, respectively. However, the source finds no basis for the 2.0 tons per year PTE for VOCs from insignificant activities that only emit particulate matter. The applicant has decided to replace the PTE of 2.0 tons of VOC per year for insignificant activities under permit condition D.1.2, which did not correspond to specific insignificant activities but was included as a "safety factor" in a previous action, with 0.89 tons per year PTE from the new four (4) surface coating booths and add the combustion PTE of 0.09 tons per year from the new five (5) natural gas-fired burners to the existing combustion PTE of 1.21 tons per year. The total from the various processes including the new emission units under condition D.1.2 will sum to 248.56 tons per year and will still render the requirements of 326 IAC 2-2 (PSD) not applicable. The insignificant activities and combustion PTE under condition D.1.2 are not limits, but calculated PTE. Therefore, an administrative amendment is appropriate for this request.

**Permit Level Determination – PSD**

The table below summarizes the potential to emit, reflecting all limits and controls, of the emission units.

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
One (1) GMX Booth	0.576	0.576	-----	0.602	-----	-----
One (1) SEPA/SHJ Booth	0.422	0.422	-----	0.058	-----	-----
One (1) SJC Booth	1.266	1.266	-----	0.174	-----	-----
One (1) SHJ Slide Booth	1.266	1.266	-----	0.058	-----	-----
Five (5) Natural Gas Fired Burners	0.030	0.13	0.010	0.090	1.44	1.71
Total for Modification	3.530	3.66	0.010	0.982	1.44	1.71
PSD Major Source Threshold	250	250	250	250	250	250

This modification to an existing PSD minor source is not major because the source emissions are

less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### Federal Rule Applicability Determination

There is no change to the applicability of any federal rules due to this modification.

#### State Rule Applicability Determination

There are no 326 IAC Article 8 rules that apply because the PTE of the new units is less than 15 pounds per day.

#### Compliance Determination and Monitoring Requirements

There are no changes to compliance determination and monitoring requirements due to this modification.

#### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 087-21424-00031. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- 1) IDEM, OAQ has determined that it is not necessary to list the Responsible Official name or title in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). The revised permit condition is as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

~~Responsible Official:~~ \_\_\_\_\_ ~~General Plants Manager~~

- 2) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-50 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-52 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
**MC61-53 IGCN1003**  
Indianapolis, Indiana 46204-2251

- 3) Section A.2 has been revised as follows to include the new emission units. Subsequent condition numbers changed:

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

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

- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
- (1) ~~One (1) Two (2) continuous surface coating operations; identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and~~
    - (a) **One (1) L-Coat Glassline Spray Booth, identified as LCSB-01, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation began in December 2006; and**
    - (b) **One (1) L-Coat Glassline Spray Booth, identified as LCSB-02, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S02. Construction of the surface coating operation is scheduled to begin in 2007; and**
  - (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. ~~Construction of the burners is scheduled to begin~~ **began** in December 2006.
- (s) **Four (4) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping, described as follows:**
- (1) **One (1) booth, identified as GMX, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack GMX;**
  - (2) **One (1) booth, identified as SEPA/SHJ, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SEPA;**

- (3) One (1) booth, identified as SJC, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SJC; and**
  - (4) One (1) booth, identified as SHJ Slide, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SHJ.**
- ~~(s)~~**(t)** Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
- (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders is ~~scheduled to begin~~ **began** in December 2006;
  - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders is ~~scheduled to begin~~ **began** in December 2006; and
  - (3) ~~Four (4)~~ **Nine (9)** natural gas-fired burners; ~~identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.~~
    - (a) Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners began in December 2006; and**
    - (b) Five (5) natural gas-fired burners, identified as LCEL-05 through LCEL-09, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S05 through LCEL-S09, respectively. Construction of the burners is scheduled to begin in 2007.**
- (4) Sections D.1 has been revised as follows to include the new emission units. Subsequent condition numbers for D.1, D.2 and D.3 under "Facility Description" have been revised:

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

- (r) Continuous Rubber Surface Coating Line consisting of the following emission units:
- (1) ~~One (1)~~ **Two (2)** continuous surface coating operations; ~~identified as L-Coat Glassline Spray Booth, utilizing fourteen (14) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation is scheduled to begin in December 2006; and~~
    - (a) One (1) L-Coat Glassline Spray Booth, identified as LCSB-01, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S01. Construction of the surface coating operation began in December 2006; and**
    - (b) One (1) L-Coat Glassline Spray Booth, identified as LCSB-02, utilizing seven (7) high volume low pressure (HVLP) spray guns with a maximum**

**capacity of 1.0 unit per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack, identified as LCSB-S02. Construction of the surface coating operation is scheduled to begin in 2007; and**

- (2) Six (6) natural gas-fired burners, identified as LCSC-01 through LCSC-06, with a maximum heat input capacity of 0.086 MMBtu/hr each, and exhausting to one (1) stack, identified as LCSC-S01. Construction of the burners ~~is scheduled to begin~~ **began** in December 2006.
- (s) **Four (4) high volume low pressure (HVLP) spray booths with dry filters to control overspray used for coating rubber weather stripping, described as follows:**
  - (1) **One (1) booth, identified as GMX, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack GMX;**
  - (2) **One (1) booth, identified as SEPA/SHJ, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SEPA;**
  - (3) **One (1) booth, identified as SJC, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SJC; and**
  - (4) **One (1) booth, identified as SHJ Slide, constructed in 2007, with a capacity of 10 grams of coating per minute, exhausting at stack SHJ.**
- (~~s~~)(t) Extrusion Line, identified as L-Coat Extrusion Line, consisting of the following emission units:
  - (1) Three (3) rubber extruders with a maximum production capacity of 447.0 pounds per hour each, and exhausting indoors. Construction of the rubber extruders ~~is scheduled to begin~~ **began** in December 2006;
  - (2) Four (4) plastic extruders with a maximum production capacity of 19.0 pounds per hour each, and exhausting indoors. Construction of the plastic extruders ~~is scheduled to begin~~ **began** in December 2006; and
  - (3) ~~Four (4) Nine (9) natural gas-fired burners: , identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners is scheduled to begin in December 2006.~~
    - (a) **Four (4) natural gas-fired burners, identified as LCEL-01 through LCEL-04, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S01 through LCEL-S04, respectively. Construction of the burners began in December 2006; and**
    - (b) **Five (5) natural gas-fired burners, identified as LCEL-05 through LCEL-09, with a maximum heat input capacity of 0.782 MMBtu/hr each and exhausting to stacks, LCEL-S05 through LCEL-S09, respectively. Construction of the burners is scheduled to begin in 2007.**

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

- (5) Condition D.1.2 has been revised to reflect the updated potential to emit for insignificant activities and for combustion units as follows:

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

The total VOC usage at the four (4) spray booths (Lines 2, 3, 5 and 6), one (1) silicone application lines (X019), two (2) CV finishing touchup stations (X004), three (3) urethane application lines (X020, X021, X023), three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot), one (1) surface coating line (X-003), two (2) spray lines (X-034 and X-036), one (1) spray line, identified as X-037, two (2) spray lines (X-039 and X-040), the L-Coat Glassline spray booth and L-Coat Extrusion Line (four plastic extruders and three rubber extruders), shall be limited to no more than 148 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. Emissions from these surface coating operations in combination with uncontrolled potential VOC emissions of 96.47 tons per year from extruding and curing operations (except the L-Coat Extrusion Line), 1.90 tons per year from mixing and milling, ~~2.0~~ **0.892** tons per year from insignificant activities **that include four (4) surface coating spray booths identified as GMX, SEPA/SHJ, SJC and SHJ Slide** and ~~4.21~~ **1.3** tons per year from combustion, shall limit the total VOC emitted at this source to less than 250 tons per year and render the requirements of 326 IAC 2-2 (PSD) not applicable.

<b>Conclusion and Recommendation</b>
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The staff recommend to the Commissioner that this Part 70 Administrative Amendment be approved.

**Appendix A: Emission Calculations**

**PTE Summary**

**Company Name:** Nishikawa Standard Company  
**Address City IN Zip:** 324 Morrow Street, Topeka, Indiana 46571  
**Administrative Amendment No.:** 087-25082-00031

**Reviewer:** Jamal Naas  
**Date:** 9/10/2007

<b>Uncontrolled Potential Emissions (tons/year)</b>			
Emissions Generating Activity			
Pollutant	Surface Coating	Combustion	TOTAL
PM	3.53	0.03	3.56
PM10	3.53	0.13	3.66
SO2	0.00	0.01	0.01
NOx	0.00	1.71	1.71
VOC	0.892	0.09	0.982
CO	0.00	1.44	1.44
Total emissions based on rated capacity at 8,760 hours/year.			
<b>Controlled Potential Emissions (tons/year)</b>			
Emissions Generating Activity			
Pollutant	Surface Coating	Combustion	TOTAL
PM	0.33	0.03	0.36
PM10	0.24	0.13	0.37
SO2	0.00	0.01	0.01
NOx	0.00	1.71	1.71
VOC	0.892	0.09	0.982
CO	0.00	1.44	1.44
Total emissions based on rated capacity at 8,760 hours/year, after control.			



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

**Company Name:** Nishikawa Standard Company  
**Address City IN Zip:** 324 Morrow Street, Topeka, Indiana 46571  
**Administrative Amendment No.:** T087-25082-00031

**Reviewer:** Jamal Naas  
**Date:** 9/10/2007

Heat Input Capacity <sup>(1)</sup> MMBtu/hr	Potential Throughput MMCF/yr
3.91	34.25

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.033	0.130	0.010	1.71	0.09	1.44

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

**Note:**  
 (1) Combined heat input capacity for the following combustion devices:  
 Five (5) natural gas burners (0.782 MMBtu/hr each)

**Methodology**

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

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: Nishikawa Standard Company**

**Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571**

**Administrative Amendment No.: 087-25082-00031**

**Reviewer: Jamal Naas**

**Date: 9/10/2007**

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.60E-05	2.06E-05	1.28E-03	3.08E-02	5.82E-05

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.56E-06	1.88E-05	2.40E-05	6.51E-06	3.60E-05

Methodology is the same as page 2.

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