



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 14, 2009

RE: Griffith Rubber Mills, Inc / 033-26072-00081

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Griffith Rubber Mills, Inc.
507 North Lee Street
Garrett, Indiana 46738**

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

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

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

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

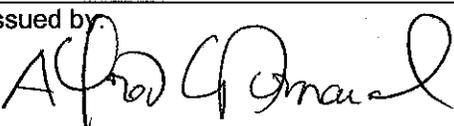
Operation Permit No.: F 033-26072-00081	
Issued by  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 14, 2009 Expiration Date: January 14, 2014

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	16
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]
- C.13 Response to Excursions or Exceedances

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 24

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

- D.1.1 Federally Enforceable State Operating Permit [326 IAC 2-8]
- D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.4 Record Keeping Requirements
- D.1.5 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 27

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

- D.2.1 Particulate Matter [326 IAC 6-2-3]
- D.2.2 Particulate Matter [326 IAC 6-2-4]
- D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Certification Form	28
Emergency Occurrence Form	29
Quarterly Report Form VOCs.....	31
Quarterly Report Form Single HAPs.....	32
Quarterly Report Form Total HAPs.....	33
Quarterly Deviation and Compliance Monitoring Report Form	34

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary custom molded rubber products manufacturing company.

Source Address:	507 North Lee Street, Garrett, Indiana 46738
Mailing Address:	507 North Lee Street, Garrett, IN 46738
General Source Phone Number:	260-357-0876
SIC Code:	3061
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Rubber Extrusion Process, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (b) One (1) Rubber Curing Process, utilizing two (2) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2. These units were constructed in 2001.
- (c) One (1) rubber mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.
- (d) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.
- (e) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.
- (f) One (1) rubber molding operation (identified as EU-006) consisting of seven (7) self-contained hydraulic molding presses and twenty-three (23) air presses (18 SMACCO and 5 JO Mory), with a combined maximum throughput of 150 pounds of rubber components per hour; and exhausting inside the building. These units were constructed in 2001. The potential to emit VOCs from EU-006 is 0.946 tons per year and the potential to emit HAPs from EU-006 is 0.716 tons per year.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:
 - (1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.
- (b) Combustion source flame safety purging on startup.
- (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) The following equipment related to manufacturing activities and hand-held equipment not resulting in the emissions of HAPS: brazing equipment, soldering equipment, welding, cutting (excluding cutting torches), machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding.
- (h) Closed loop heating and cooling systems.
- (i) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Filter or coalescer media changeout.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^o Celsius).
- (o) Natural gas-fired direct heating combustion sources from twelve (12) heaters with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour with a combined maximum heat input capacity of 2.48 MMBtu per hour.

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F 033-26072-00081, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or

contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F 033-26072-00081 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

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

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.
- (b) Any modification at an existing major source is governed by the requirements of.

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.7 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

C.14 Risk Management Plan [326 IAC 2-8-4] [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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Rubber Extrusion Process, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3(part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (b) One (1) Rubber Curing Process, utilizing two (2) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2. These units were constructed in 2001.
- (c) One (1) rubber mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.
- (d) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.
- (e) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.
- (f) One (1) rubber molding operation (identified as EU-006) consisting of seven (7) self-contained hydraulic molding presses and twenty-three (23) air presses (18 SMACCO and 5 JO Mory), with a combined maximum throughput of 150 pounds of rubber components per hour; and exhausting inside the building. These units were constructed in 2001. The potential to emit VOCs from EU-006 is 0.946 tons per year and the potential to emit HAPs from EU-006 is 0.716 tons per year.

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

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

D.1.1 Federally Enforceable State Operating Permit (FESOP) [326 IAC 2-8]

The Permittee shall comply with the following:

- (a) VOC emissions from the Autoclave (EPDM 1) shall not exceed 0.00615 pounds of VOC per pound of rubber processed;
- (b) carbon disulfide emissions from the Autoclave (EPDM 1) shall not exceed 0.00593 pounds of carbon disulfide per pound of rubber processed;
- (c) the amount of rubber processed in the Autoclave (EPDM 1) shall not exceed two million and eight hundred-fifty thousand (2,850,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) carbon disulfide emissions from the Hot Air Cure (EPDM 1) shall not exceed 0.000643 pounds of carbon disulfide per pound of rubber processed; and

- (e) the amount of rubber processed from the Hot Air Cure (EPDM 1) shall not exceed one million (1,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits for (a) and (b) above, shall limit the VOC emissions from the Autoclave (EPDM 1) to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-7 (Part 70 permits) not applicable.

Compliance with these limits for (b), (c), (d), and (e) above, shall limit the source-wide total potential to emit of any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the three (3) rubber extruders and the one (1) rubber mixing facility shall not exceed the pounds per hour limit as shown in the table below:

Emission Unit	Process Weight		Particulate Emission Limit (lb/hour)
	(tons/hour)	(lb/hour)	
Each of the three (3) Extruders	1.5	2995	5.4
Rubber Mixing Operation	0.7	1350	3.2

The pounds per hour limitations were calculated using the following equation:

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

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

Based on potential to emit calculations (see Appendix A, page 1 of 9), the particulate emissions from the three (3) extruder lines are negligible and the particulate emissions from the rubber mixing operation are 0.26 pounds per hour, uncontrolled. Therefore, the Permittee is in compliance with the above limits.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Condition D.1.1.

- (1) The type of material and its maximum throughput in pounds per hour used in the

rubber manufacturing facilities consisting of rubber extrusion process, rubber molding, rubber curing process, and rubber mixing.

- (2) The amount of material and solvent less water used on a monthly basis in the adhesive coating line, printing operation, and splicing operation.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The VOC and HAP usage for each compliance period in the adhesive coating line, printing operation, and splicing operation
 - (4) Records of all calculations required by Condition D.1.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:
- (1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.

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

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

D.2.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the Continental boiler with a 4.55 MMBtu per hour heat input shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where P_t = Pounds of particulate matter emitted per million Btu (lb per MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

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

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

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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• 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081
Facility: EPDM 1 - Autoclave
Parameter: VOC emissions
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081
Facility: EPDM 1 - Autoclave and EPDM 1 - Hot Air Cure
Parameter: HAPs emissions
Limit: Any single HAP to less than ten (10) tons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081
Facility: EPDM 1 - Autoclave and EPDM 1 - Hot Air Cure
Parameter: HAPs emissions
Limit: Total HAPs to less than twenty-five (25) tons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Griffith Rubber Mills, Inc.
Source Address: 507 North Lee Street, Garrett, Indiana 46738
Mailing Address: 507 North Lee Street, Garrett, IN 46738
FESOP Permit No.: F 033-26072-00081

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP)

Source Description and Location

Source Name:	Griffith Rubber Mills, Inc.
Source Location:	507 North Lee Street, Garrett, Indiana 46738
County:	Dekalb
SIC Code:	3061
Operation Permit No.:	F 033-26072-00081
Permit Reviewer:	Christine L. Filutze

On February 8, 2008, the Office of Air Quality (OAQ) received an application from Griffith Rubber Mills relating to the operation of a stationary custom molded rubber products manufacturing company.

Source Definition

Griffith Rubber Mills was issued FESOP (033-17355-00080) on June 23, 2004 for its two (2) facilities located in Garrett, Indiana. On February 8, 2008, the OAQ received an application from Griffith Rubber Mills requesting to renew its operating permit separately for each of the two Garrett, Indiana locations.

Pursuant to FESOP No. 033-17355-00080, issued June 23, 2004, this custom molded rubber products manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 400 North Taylor Road, Garrett, Indiana 46738, Plant ID: 033-00080; and
- (b) Plant 2 is located at 507 North Lee Street, Garrett, Indiana 46738, Plant ID: 033-00081.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

IDEM has determined that these plants are not one major source. Both plants have the same owner and same two-digit SIC code but the properties on which they are located are not contiguous, so we have to consider the question of "adjacency." When considering the question of "adjacency," the OAQ tries to determine if the plants are operating as a single source or as two separate independent sources. The distance between the two (2) plants and the existence and amount of support between the plants are factors considered when determining whether the plants are adjacent or not.

The two (2) plants are located more than one (1) mile apart. Neither facility acts as a support facility for the other. The two (2) plants produce different products and do not depend upon the other to exist or operate. The OAQ has determined that the two plants do not meet the criteria of "adjacency." Therefore, these two plants are considered two separate sources so two separate permits will be issued. If the support relationship between the two plants changes significantly, OAQ may need to re-evaluate this decision. Thus, based on this evaluation, these plants will not be considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Thus, Plant 1 (400 North Taylor Road, Garrett, Indiana) will be issued a Renewal (033-26536-00080) to the original FESOP and Plant 2 (507 North Lee Street, Garrett, Indiana) will be issued a new FESOP (033-26072-00081).

Existing Approvals

Since the issuance of the FESOP (033-17355-00080) on June 23, 2004 the source has constructed or has been operating under the following approvals as well:

FESOP Significant Permit Revision 033-20567-00080.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM2.5
Dekalb County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants
Dekalb County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Griffith Rubber Mills on February 8, 2008, relating to operation of a stationary custom molded rubber products manufacturing company.

The source consists of the following permitted emission units:

- (a) One (1) Rubber Extrusion Process, utilizing three (3) rubber extruding lines [identified as extruder 1, 2 and 3 (part of the microwave line)] with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.
- (b) One (1) Rubber Curing Process, utilizing two (2) autoclaves and one (1) hot air oven cure (part of microwave line), with a combined maximum throughput rate of 2,995 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2. These units were constructed in 2001.
- (c) One (1) rubber mixing operation, with a combined maximum throughput rate of 1,350 pounds of EPDM Sulfur Cure per hour, which is the main rubber compound processed at this location, controlled by one (1) baghouse and exhausting inside the building. This unit was constructed in 2001.
- (d) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.
- (e) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

Insignificant activities consisting of the following:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:
 - (1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour and exhausting at stack B2. This unit was installed in 1999.
- (b) Combustion source flame safety purging on startup.
- (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) The following equipment related to manufacturing activities and hand-held equipment not resulting in the emissions of HAPS: brazing equipment, soldering equipment, welding, cutting (excluding cutting torches), machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding.

- (h) Closed loop heating and cooling systems.
- (i) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Filter or coalescer media changeout.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38^o Celsius).
- (o) Natural gas-fired direct heating combustion sources from twelve (12) heaters with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour with a combined maximum heat input capacity of 2.48 MMBtu per hour.

The source consists of the following inactive emission units:

- (a) One (1) Columbia boiler, installed in 1959, burning natural gas, with a maximum heat input capacity of 6.48 MMBtu per hour and exhausting at stack B3. This boiler is currently inoperable, not connected to a gas line, and has a physical barrier (concrete block wall) around it.

The following is a list of unpermitted emission units and pollution control devices:

- (a) One (1) rubber molding operation (identified as EU-006) consisting of seven (7) self-contained hydraulic molding presses and twenty-three (23) air presses (18 SMACCO and 5 JO Mory), with a combined maximum throughput of 150 pounds of rubber components per hour; and exhausting inside the building. These units were constructed in 2001. The potential to emit VOCs from EU-006 is 0.946 tons per year and the potential to emit HAPs from EU-006 is 0.716 tons per year.

Pursuant to 326 IAC 2-1.1-3(e)(1), the Permittee is exempt from the requirement to obtain prior approval to construct and/or operate the rubber molding operation (EU-006) because it has the potential to emit less than five (5) tons per year VOCs and less than one (1) ton of a single HAP per year or two and one-half (2.5) tons per year of any combination of HAPs.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.24
PM10 ⁽¹⁾	1.58
PM2.5	1.58
SO ₂	0.04
NO _x	5.92
VOC	65.00
CO	4.97

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Benzene	0.30
Hexane	0.12
Toluene	5.53
Carbon Disulfide	37.23
Carbonyl Sulfide	1.80
o-Xylene	0.18
Methylene Chloride	0.17
Acetophenone	0.80
Acrylonitrile	1.22
Propylene Oxide	0.72
TOTAL HAPs	48.18

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of all regulated criteria pollutants are less than one hundred (100) tons per year.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas (boilers, furnaces, space heaters, and/or comfort units)	0.11	0.45	0.45	0.04	5.92	0.33	4.97	0.11	
EPDM 1 (Sulfur Cure)	0.86	0.86	0.86	-	-	10.96	-	9.97	9.25 (carbon disulfide)
CRW (Neoprene)	2.44E-04	2.44E-04	2.44E-04	-	-	0.01	-	2.61E-03	
Paracryl BLT (NBR)	0.26	0.26	0.26	-	-	15.93	-	3.93	0.63 (carbon disulfide)
Toluene Splicing	-	-	-	-	-	5.40	-	5.40	
Total PTE of Entire Source	1.24	1.58	1.58	0.04	5.92	32.62	4.97	< 25	< 10 (carbon disulfide)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
' - ' = none to report * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

(a) FESOP Status

This source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall limit the throughput per the State Rule Applicability – Individual Facilities section of this permit.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit criteria pollutants is less than 250 tons per year and the potential to emit all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.
- (c) The requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Rubber Tire Manufacturing (326 IAC 14) are not included for this modification because the Permittee does not manufacture tires. The Permittee manufactures custom molded rubber products used for trucks, cars, air conditioners, farming equipment, school buses, etc.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

State Rule Applicability – Individual Facilities

- (a) 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP))
The Permittee shall comply with the following:
- (1) VOC emissions from the Autoclave (EPDM 1) shall not exceed 0.00615 pounds of VOC per pound of rubber processed;
 - (2) carbon disulfide emissions from the Autoclave (EPDM 1) shall not exceed 0.00593 pounds of carbon disulfide per pound of rubber processed;
 - (3) the amount of rubber processed in the Autoclave (EPDM 1) shall not exceed two million and eight hundred-fifty thousand (2,850,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (4) carbon disulfide emissions from the Hot Air Cure (EPDM 1) shall not exceed 0.000643 pounds of carbon disulfide per pound of rubber processed; and
 - (5) the amount of rubber processed from the Hot Air Cure (EPDM 1) shall not exceed one million (1,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits for (1) and (2) above, shall limit the VOC emissions from the Autoclave (EPDM 1) to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-7 (Part 70 permits) not applicable.

Compliance with these limits for (2), (3), (4), and (5) above, shall limit the source-wide total potential to emit of any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the

particulate emissions from the three (3) rubber extruders and the one (1) rubber mixing facility shall not exceed the pounds per hour limit as shown in the table below:

Emission Unit	Process Weight		Particulate Emission Limit (lb/hour)
	(tons/hour)	(lb/hour)	
Each of the three (3) Extruders	1.5	2995	5.4
Rubber Mixing Operation	0.7	1350	3.2

The pounds per hour limitations were calculated using the following equation:

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

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

Based on potential to emit calculations (see Appendix A, page 1 of 9), the particulate emissions from the three (3) extruder lines are negligible and the particulate emissions from the rubber mixing operation are 0.26 pounds per hour, uncontrolled. Therefore, the Permittee is in compliance with the above limits.

- (c) 326 IAC 6-2-4 (Particulate Matter)
 Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the Continental boiler with a 4.55 MMBtu per hour heat input shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}} \quad \text{Where } P_t = \text{Pounds of particulate matter emitted per} \\ \text{million Btu (lb per MMBtu) heat input.}$$

Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

- (d) 326 IAC 8-1-6 (Volatile Organic Compounds (VOC))
 Pursuant to 326 IAC 8-1-6, the potential VOC emissions from the Rubber Curing Process consisting of two (2) autoclaves and one (1) hot air oven cure line shall each be limited to less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limits makes 326 IAC 8-1-6 not applicable.
- (e) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
 This facility does not manufacture rubber tires. Therefore, 326 IAC 8-5-4 is not applicable.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the provisions of 326 IAC 6-3. The brazing equipment, soldering equipment, welding, cutting (excluding cutting torches), machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding have potential emissions less than 0.551 pound per hour. Therefore, these processes are not subject to the provisions of 326 IAC 6-3.

- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

There is no applicable compliance monitoring applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 8, 2008. Additional information was received on April 10, 2008 and July 28, 2008.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. 033-26072-00081. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Christine L. Filutze at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (233-8397) or toll free at 1-800-451-6027 extension (38397).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Appendix A: Emission Calculations

Emissions Summary

Company Name: Griffith Rubber Mills, Inc.

Address: 507 North Lee Street, Garrett, Indiana 46738

FESOP: 033-26072-00081

Reviewer: Christine L. Filutze

Date: November 25, 2008

Potential To Emit (PTE) Before Controls - tons per year (tpy)

Emission Source	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	HAPs	Highest Single HAP	
Natural Gas	0.11	0.45	0.45	0.04	5.92	0.33	4.97	0.11		
EPDM 1	0.86	0.86	0.86			43.34		38.74	36.60	Carbon Disulfide
CRW	2.44E-04	2.44E-04	2.44E-04			0.01		2.61E-03		
Paracryl BLT	0.26	0.26	0.26			15.93		3.93	0.63	Carbon Disulfide
Toluene						5.40		5.40		
Totals	1.24	1.58	1.58	0.04	5.92	65.00	4.97	48.18	37.23	Carbon Disulfide

Limited PTE - tons per year (tpy)

Emission Source	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	HAPs	Highest Single HAP	
Natural Gas	0.11	0.45	0.45	0.04	5.92	0.33	4.97	0.11		
EPDM 1	0.86	0.86	0.86			10.96		9.97	9.25	Carbon Disulfide
CRW	2.44E-04	2.44E-04	2.44E-04			0.01		2.61E-03		
Paracryl BLT	0.26	0.26	0.26			15.93		3.93	0.63	Carbon Disulfide
Toluene						5.40		5.40		
Totals	1.24	1.58	1.58	0.04	5.92	32.62	4.97	< 25	< 10	Carbon Disulfide

PTE Before Controls

PM Three (3) Extruder Lines =	3.01E-04	tons/yr
(EPDM 1, CRW, Paracryl BLT)		

PM Mixing Operations =	1.13	tons/yr	=	0.26	pounds/hr
(EPDM 1, CRW, Paracryl BLT)					

* The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

Appendix A: Emission Calculations

Natural Gas Emissions

Company Name: Griffith Rubber Mills, Inc.
Address: 507 North Lee Street, Garrett, Indiana 46738
FESOP: 033-26072-00081
Reviewer: Christine L. Filutze
Date: November 25, 2008

EPDM 1 Autoclave Limited to 2,850,000 lbs/yr
EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Emission Source	Heat Input Capacity (MMBTU/Hr)	Potential Throughput
Boiler - Continental	4.55	39840.48
Boiler - Columbia	6.48	56764.80
Modine Heaters (3)	0.45	3942.00
Modine Heater	0.10	876.00
Reznor Heaters (3)	1.20	10512.00
Reznor Heater	0.30	2628.00
Reznor Heater	0.17	1445.40
Reznor Heater	0.13	1095.00
Space Ray Heater	0.05	455.52
Rheem Heater	0.09	788.40
Total		118347.60

MMBTU/Yr = 118.35 MMCF

Natural Gas Usage (Natural Gas Fired Boilers, Furnaces, Space Heaters, and/or Comfort Units) Pollutant								
Month	Total Usage (MMCF)	PM (lb)	PM10 (lb)	PM2.5 (lb)	SO2 (lb)	NOx (lb)	VOC (lb)	CO (lb)
Annual Usage	118.35	224.86	899.44	899.44	71.01	11834.76	650.91	9941.20
		0	0	0	0	0	0	0
		0	0	0	0	0	0	0
Total	118.35	224.86	899.44	899.44	71.01	11834.76	650.91	9941.20
Total (tons)		0.11	0.45	0.45	0.04	5.92	0.33	4.97

Natural Gas Usage (Natural Gas Fired Boilers, Furnaces, Space Heaters, and/or Comfort Units) HAPs- Organics							
Month	Total Usage (MMCF)	Benzene (lb)	Dichlorobenzene (lb)	Formaldehyde (lb)	Hexane (lb)	Toluene (lb)	NH3 (lb)
	118.35	0.25	0.14	8.88	213.03	0.40	0.19
		0	0	0	0	0	
		0	0	0	0	0	
Total	118.35	0.25	0.14	8.88	213.03	0.40	0.19
Total (tons)		1.24E-04	7.10E-05	4.44E-03	0.11	2.01E-04	9.47E-05

Natural Gas Usage (Natural Gas Fired Boilers, Furnaces, Space Heaters, and/or Comfort Units) HAPs- Metals						
Month	Total Usage (MMCF)	Lead (lb)	Cadmium (lb)	Chromium (lb)	Manganese (lb)	Nickel (lb)
	118.35	0.59	0.13	0.17	0.04	0.25
		0	0	0	0	0
		0	0	0	0	0
Total	118.35	0.06	0.13	0.17	0.04	0.25
Total (tons)		2.96E-05	6.51E-05	8.28E-05	2.25E-05	1.24E-04

Methodology

All emission factors are based on normal firing.

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

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Production Data

EPDM 1 Autoclave Limited to 3,000,000 lbs/yr
EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Company Name: Griffith Rubber Mills, Inc.
Address: 507 North Lee Street, Garrett, Indiana 46738
FESOP: 033-26072-00081
Reviewer: Christine L. Filutze
Date: November 25, 2008

EPDM 1 Autoclave Limited to 2,850,000 lbs/yr
EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Lbs/Hr Thruput Data

	Pounds/Yr Total Production	MAX POUNDS/HOUR Thruput					
		% of production*	Extrusion Max**	Press Max	Autoclave Max	Air Cure Max	Mixing Max
EPDM Autoclave	1166226	0.60	1800	90	1188	784	811
EPDM Hot Air	107818	0.06	166	8	110	72	75
Nitrile	665130	0.34	1027	51	678	447	463
Neoprene	1022	0.00	2	0	1	1	1
Total Production	1940196		2995	150	1977	1305	1350

Lbs/Year Thruput Data

	MAX POUNDS/Year Thruput based on 8760 hrs/year				
	Extrusion Max	Press Max	Autoclave Max	Air Cure Max	Mixing Max
EPDM Autoclave	15770230.73	789827.92	10408352.28	6869512.51	7108451.25
EPDM Hot Air	1457963.33	73019.87	962255.79	635088.82	657178.79
Nitrile	8994186.00	450460.07	5936162.76	3917867.42	4054140.60
Neoprene	13819.94	692.15	9121.16	6019.97	6229.36

Tons/Year Thruput Data

	MAX TONS/Year Thruput based on 8760 hrs/year				
	Extrusion Max	Press Max	Autoclave Max	Air Cure Max	Mixing Max
EPDM Autoclave	7885.12	394.91	5204.18	3434.76	3554.23
EPDM Hot Air	728.98	36.51	481.13	317.54	328.59
Nitrile	4497.09	225.23	2968.08	1958.93	2027.07
Neoprene	6.91	0.35	4.56	3.01	3.11

	Max Rate (lbs/hr)	Max Rate (tons/hr)	lbs/hr limit***	Emission Factor for PM/PM10 (lb pollutant / lb rubber)****	PTE of PM/PM10 (lb/hour)
Total Extrusion	2995	1.5	5.4	2.67E-08	8.00E-05
+2 Autoclaves	1977	1.0	4.1		
+1 Hot Air Cure Oven	1305	0.7	3.1		
Mixing	1350	0.7	3.2	2.22E-04	0.30
Presses	150	0.1	0.7		

Methodology

* Percent of Production = Total production for operation divided by total production for all operations.

**Extrusion Max = Max Rate (lbs/hr) times percent (%) production.

*** Lbs/hr limit , where $E = 4.10 P^{0.67}$

****Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products

Appendix A: Emission Calculations

EPDM 1 (EPDM Sulfur Cure)

EPDM 1 Autoclave Limited to 2,850,000 lbs/yr

EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Company Name: Griffith Rubber Mills, Inc.
Address: 507 North Lee Street, Garrett, Indiana 46738
FESOP: 033-26072-00081
Reviewer: Christine L. Filutze
Date: November 25, 2008

Rubber Compound # 8

EPDM	Lbs Processed/yr	EF	Lbs VOC	Tons/Year					
				VOC	HAPs (Speciated)	EF for PM	PM	PM10	PM2.5
Extrusion	17,228,194.06	3.95E-05	680.51	0.34	0.25	2.67E-08	2.30E-04	2.30E-04	2.30E-04
Autoclave	11,370,608.08	0.00615	69,929.24	34.96	34.24				
Hot Air Cure	7,504,601.33	0.0019	14,258.74	7.13	3.60				
Mixing	7,765,630.04	7.38E-05	573.10	0.29	0.21	2.22E-04	0.86	0.86	0.86
Presses	862,847.78	0.00144	1,242.50	0.62	0.45				
Totals	44,731,881.29		86,684.10	43.34	38.74		0.86	0.86	0.86

Autoclave LIMITED	2,850,000	0.00615	17,527.50	8.76	8.58
Hot Air Cure LIMITED	1,000,000	0.0019	1,900.00	0.95	0.48
Totals LIMITED	29,706,672		34,282.36	10.96	9.97

Speciated HAP's

Extrusion	Carbon Disulfide			Carbonyl Sulfide			Toluene			Methylene Chloride			Hexachloroethane		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	1.50E-05	258.42	0.13	1.20E-05	206.74	0.10	7.05E-07	12.15	0.01	2.58E-07	4.44	0.002	6.84E-07	11.78	0.01
Autoclave	Carbon Disulfide			Carbonyl Sulfide			Toluene			m,p-Xylene			Benzene		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	5.93E-03	67427.71	33.71	4.17E-05	474.15	0.24	1.59E-05	180.79	0.09	1.34E-05	152.37	0.08	2.07E-05	235.37	0.12
Hot Air Cure	Carbon Disulfide			o-Xylene			Toluene			Benzene			Acetophenone		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	6.43E-04	4825.46	2.41	4.92E-05	369.23	0.18	4.37E-06	32.80	0.02	4.88E-05	366.22	0.18	2.13E-04	1598.48	0.80
Mixing	Carbon Disulfide			Carbonyl Sulfide			Toluene			Hexane			2-Butanone		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	2.81E-05	218.21	0.11	2.24E-05	173.95	0.09	1.32E-06	10.25	0.01	1.28E-06	9.94	0.005	5.08E-07	3.94	0.002
Presses	Carbon Disulfide			Carbonyl Sulfide			Toluene			Hexane			2-Butanone		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	5.48E-04	472.84	0.24	4.39E-04	378.79	0.19	2.57E-05	22.18	0.01	2.50E-05	21.57	0.01	9.92E-06	8.56	0.004
Totals	Carbon Disulfide			Carbonyl Sulfide			Toluene			Methylene Chloride			Hexachloroethane		
			Tons			Tons			Tons			Tons			Tons
			36.60			0.62			0.13			0.002			0.006
						0.18						0.08			0.80
												0.30			0.006
												0.016			

Speciated HAP's LIMITED

Autoclave LIMITED	Carbon Disulfide			Carbonyl Sulfide			Toluene			m,p-Xylene			Benzene		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	5.93E-03	16900.50	8.45	4.17E-05	118.85	0.06	1.59E-05	45.32	0.023	1.34E-05	38.19	0.02	2.07E-05	59.00	0.029
Hot Air Cure LIMITED	Carbon Disulfide			o-Xylene			Toluene			Benzene			Acetophenone		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	6.43E-04	643.00	0.32	4.92E-05	49.20	0.02	4.37E-06	4.37	2.19E-03	4.88E-05	48.80	0.02	2.13E-04	213.00	0.11

Speciated HAP's Limited Totals	Carbon Disulfide			Carbonyl Sulfide			Toluene			Methylene Chloride			Hexachloroethane		
			Tons			Tons			Tons			Tons			Tons
			9.25			0.44			0.05			0.002			0.006
						0.02						0.02			0.11
												0.05			0.006
												0.011			

Methodology

Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products

Appendix A: Emission Calculations

Neoprene (CRW)

Company Name: Griffith Rubber Mills, Inc.**Address:** 507 North Lee Street, Garrett, Indiana 46738**FESOP:** 033-26072-00081**Reviewer:** Christine L. Filutze**Date:** November 25, 2008*EPDM 1 Autoclave Limited to 2,850,000 lbs/yr**EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr****Rubber Compound # 11***

Neoprene (CRW)	Lbs Processed/yr	EF	Lbs VOC	Tons VOC	EF	Lbs HAPs	Tons HAPs	EF	Tons PM	Tons PM10	Tons PM2.5
Extrusion	13819.94	1.89E-05	0.26	1.31E-04	6.12E-06	0.08	4.23E-05	9.45E-09	6.53E-08	6.53E-08	6.53E-08
Autoclave	9121.16	4.87E-04	4.44	2.22E-03	3.18E-04	2.90	1.45E-03				
Hot Air Cure	6019.97	8.67E-04	5.22	2.61E-03	2.81E-04	1.69	8.46E-04				
Mixing	6229.36	3.52E-05	0.22	1.10E-04	1.14E-05	0.07	3.55E-05	7.83E-05	2.44E-04	2.44E-04	2.44E-04
Presses	692.15	7.31E-04	0.51	2.53E-04	6.68E-04	0.46	2.31E-04				
Totals	35882.58		10.65	5.32E-03		5.21	2.61E-03		2.44E-04	2.44E-04	2.44E-04

Methodology

Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products

Appendix A: Emission Calculations

Paracryl BLT (NBR)

EPDM 1 Autoclave Limited to 2,850,000 lbs/yr
 EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Company Name: Griffith Rubber Mills, Inc.
Address: 507 North Lee Street, Garrett, Indiana 46738
FESOP: 033-26072-00081
Reviewer: Christine L. Filutze
Date: November 25, 2008

Rubber Compound # 14

Paracryl BLT (NBR)	Lbs Processed/yr	EF	Lbs VOC	Tons VOC	Tons HAPs	EF	Tons PM	Tons PM10	Tons PM2.5
Extrusion	8994186.00	0.0000814	732.13	0.37	0.09	1.57E-08	7.06E-05	7.06E-05	7.06E-05
Autoclave	5936162.76	0.00257	15255.94	7.63	1.81				
Hot Air Cure	3917867.42	0.00374	14652.82	7.33	1.74				
Mixing	4054140.60	0.000152	616.23	0.31	0.07	1.30E-04	0.26	0.26	0.26
Presses	450460.07	0.00133	599.11	0.30	0.23				
Totals	23352816.86		31856.23	15.93	3.93		0.26	0.26	0.26

Speciated HAP's

Extrusion	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Methylene Chloride			Propylene Oxide		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	6.29E-06	56.57	0.03	2.28E-06	20.51	0.01	6.06E-06	54.50	0.03	8.99E-07	8.09	0.004	3.73E-06	33.55	0.02
Autoclave	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Methylene Chloride			Propylene Oxide		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	1.99E-04	1181.30	0.59	7.20E-05	427.40	0.21	1.91E-04	1133.81	0.57	2.84E-05	168.59	0.08	1.18E-04	700.47	0.35
Hot Air Cure	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Methylene Chloride			Propylene Oxide		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	2.89E-04	1132.26	0.57	1.05E-04	411.38	0.21	2.79E-04	1093.09	0.55	4.13E-05	161.81	0.08	1.72E-04	673.87	0.34
Mixing	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Methylene Chloride			Propylene Oxide		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	1.17E-05	47.43	0.02	4.26E-06	17.27	0.01	1.13E-05	45.81	0.02	1.68E-06	6.81	0.003	6.97E-06	28.26	0.01
Presses	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Hexane			1,3 Butadiene		
	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons	EF	Lbs	Tons
	3.02E-05	13.60	0.01	8.67E-04	390.55	0.20	8.80E-05	39.64	0.02	6.50E-06	2.93	0.001	2.17E-05	9.77	0.005
Totals	Acrylonitrile			Carbon Disulfide			Carbonyl Sulfide			Methylene Chloride			Propylene Oxide		
			Tons 1.22			Tons 0.63			Tons 1.18			Tons 0.17			Tons 0.72
											Hexane 0.001				1,3 Butadiene 0.005

Methodology

Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products

Appendix A: Emission Calculations

Toluene Splicing (HAP)

Company Name: Griffith Rubber Mills, Inc.
Address: 507 North Lee Street, Garrett, Indiana 46738
FESOP: 033-26072-00081
Reviewer: Christine L. Filutze
Date: November 25, 2008

EPDM 1 Autoclave Limited to 2,850,000 lbs/yr
EPDM 1 Hot Air Cure Limited to 1,000,000 lbs/yr

Splicing Operation

Max Thruput	0.17 gal/hr.
Density	0.87 specific gravity 7.26 lb/gal

Splicing Operation	Toluene (HAP)	
Max Thruput (lbs/hr)	Annual PTE (lbs)	Annual PTE (tons)
1.23	10805.34	5.40

Methodology

Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products