



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: September 23, 2008

RE: BF Goodrich Tire Manufacturing / 003-26647-00008

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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September 23, 2008

Mr. Kevin Rogers
BF Goodrich Tire Manufacturing
P.O. Box 227
Woodburn, Indiana 46797-0277

RE: 003-26647-00008
First Significant Permit Modification to
Part 70 Operating Permit Renewal No.: T003-20341-00008

Dear Mr. Rogers:

BF Goodrich Tire Manufacturing was issued a Part 70 Operating Permit T003-20341-00008 for a stationary rubber tire manufacturing source. An application requesting changes to this permit was received on March 27, 2008. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification application, submitted by BF Goodrich Tire Manufacturing, relates to a change in raw materials used in the Banbury mixing operation and the tire curing operation. BF Goodrich Tire Manufacturing applied to allow the use of silica and silane binder in the mixing and curing operations. The proposed modification does not require a physical change in the mixing or curing equipment and will not result in a change in throughput. However, the new binder material has a higher VOC emission rate and requires a minor limit for the project to remain under PSD significant levels.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact David Matousek, IDEM, Permits Branch, OAQ, 100 North Senate Avenue, MC61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027 and ask for David Matousek or extension 2-8253, or dial direct (317) 232-8253.

Sincerely,

Original document signed by

Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments
DJM/djm

CC: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector
Compliance Branch
Administrative and Development Section



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**BF Goodrich Tire Manufacturing
18906 Highway 24 East
Woodburn, Indiana 46797**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-20341-00008	
Issued by: Original Signed by Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 3, 2008 Expiration Date: September 3, 2013

First Significant Permit Modification No.: 003-26647-00008	
Issued by: <i>Original document signed by</i> Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 23, 2008 Expiration Date: September 3, 2013

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rubber tire manufacturing facility.

Source Address:	18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address:	P.O. Box 277, Woodburn, Indiana 46797-0277
General Source Phone Number:	(260) 493-8100
SIC Code:	3011
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act; and Not 1 of 28 Source Categories

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

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

- (a) One (1) carbon black unloading area, identified as EU-01, installed in 1961 and modified in 1996, with a maximum capacity of 18,916 pounds per hour, using four baghouses as control, exhausting at stacks 356 A - D. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (b) One (1) Banbury mixing area, identified as EU-02, consisting of three (3) mixers operating in series, constructed in 1961 and modified in 1968 and 2007, with a maximum capacity of 46,974 pounds of rubber, carbon black, and chemicals per hour, using three (3) baghouses for control and exhausting at stacks 197, 200, 201 to 203, 208, 210, 211, 216, 286, and 414.
- (c) Four (4) natural gas or No. 2/No. 6 fuel oil or fuel oil blend fired boilers, identified as #1, #2, #3, (constructed in 1961), and #5 (constructed in 1974), with maximum capacities of 52, 52, 52, and 130 million British thermal units per hour (MMBtu/hr), respectively, using no control. Boilers #1 and #2 exhaust at stack 109, boiler #3 exhausts at stack 114, and boiler #5 exhausts at stack 257.
- (d) One (1) component preparation area, identified as EU-03, which includes milling, extruding, and calendaring, constructed prior to 1974 with one mill constructed in 2007, with a maximum capacity of 49,420 pounds per hour for milling and 48,378 pounds per hour for calendaring and extruding, using no control, exhausting at stacks 173, 174, 186, 254, 255, 318, 324, 325, 326, 327, 328, 329, 330, and 415. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (e) One (1) tire building area, constructed in 1961, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stack 279. This unit is an affected facility under 40 CFR 63, Subpart XXXX.

- (f) One (1) tire curing process, identified as EU-05, with 178 presses constructed in 1961 and modified in 2004, and 26 presses approved for construction in 2007, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stacks 52-58, 61-66, 69, 71, 73, 75, 77, 79, 80, and 83-88. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (g) One (1) white side wall (WSW) grinding and tire uniformity optimizer (TUO) Module Area, constructed in 1961 and modified in 2003, with a maximum capacity of 35,467 pounds per hour for WSW grinding and 7,093 pounds per hour for TUO operations, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (h) One (1) tread end cementing process consisting of lines #1 and #2, identified as EU-04, with a maximum production capacity of 2,081 tires per hour or 33,646 pounds per hour, constructed in 1961 and modified in 1990 and 1996, using particulate baffle filters, exhausting to one of the four process boilers to control VOC. This unit is an affected facility under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (i) Miscellaneous solvent usage.

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

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (c) One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 2-6; [326 IAC 8-3-2]

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T003-20341-00008, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or

possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T003-20341-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2 and/or 326 IAC 2-3 (for sources located in NA areas).

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to significant source modification number 003-20073-00008.

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 18, 2001.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (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) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions

increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[326 IAC 2-2][326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (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.21 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) carbon black unloading area, identified as EU-01, installed in 1961 and modified in 1996, with a maximum capacity of 18,916 pounds per hour, using four baghouses as control, exhausting at stacks 356 A - D. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (b) One (1) Banbury mixing area, identified as EU-02, consisting of three (3) mixers operating in series, constructed in 1961 and modified in 1968 and 2007, with a maximum capacity of 46,974 pounds of rubber, carbon black, and chemicals per hour, using three (3) baghouses for control and exhausting at stacks 197, 200, 201 to 203, 208, 210, 211, 216, 286, and 414.
- (g) One (1) white side wall (WSW) grinding and tire uniformity optimizer (TUO) Module Area, constructed in 1961 and modified in 2003, with a maximum capacity of 35,467 pounds per hour for WSW grinding and 7,093 pounds per hour for TUO operations, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277. This unit is an affected facility under 40 CFR 63, Subpart XXXX.

(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 2-7-5(1)]

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the Banbury mixing area or the tire curing process, the Permittee shall:

- 1) limit the input of silane binder, degussa X 50-S or equivalent, to the Banbury mixing area and tire curing process to less than 467,800 lb per twelve consecutive month period with compliance determined at the end of each month; and
- 2) ethanol emissions shall not exceed 0.171 pounds of ethanol per pound of silane input to the Banbury mixing area and tire curing process.

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

Pursuant to 326 IAC 6-3-2, particulate emissions shall be limited as follows:

- (a) Carbon black unloading shall not exceed 18.48 pounds per hour when operating at a process weight rate of 18,916 pounds per hour.
- (b) Banbury mixing shall not exceed 33.98 pounds per hour when operating at a process weight rate of 46,974 pounds per hour.
- (c) WSW grinding shall not exceed 28.15 pounds per hour when operating at a process weight rate of 35,467 pounds per hour.
- (d) The TUO module area shall not exceed 9.58 pounds per hour when operating at a process weight rate of 7,093 pounds per hour.

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with condition D.1.2, the dust collectors, baghouses, and centrifugal separators for particulate control shall be in operation and control emissions from the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area at all times that the facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Monitoring [40 CFR 64]

- (a) Visible emission notations of the carbon black unloading area baghouse stack exhausts (stacks 356A, 356B, 356C and 356D) shall be performed once per day during normal daylight operations. A trained employee or a trained contractor shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the banbury mixing, pellet spiraling for banbury mixing, BB dump and pellet feed for banbury mixing baghouse stack exhausts (stacks 200, 208 and 210) shall be performed once per day during normal daylight operations. A trained employee or a trained contractor shall record whether emissions are normal or abnormal.
- (c) Visible emission notations of the WSW grinding and TUO module area stack exhausts (stacks 258 to 261 and 265 to 277) shall be performed once per day during normal daylight operations. A trained employee or a trained contractor shall record whether emissions are normal or abnormal.
- (d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (e) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (f) A trained employee or contractor is a person who has worked or trained at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (g) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring [40 CFR 64]

The Permittee shall perform automatic daily monitoring and recording of the pressure differential readings on the banbury mixers, BB dump, and pellet feed. This information shall be provided by a PLC/differential pressure transducer based system. The system shall take daily readings of the baghouses pressure drop ranges and shall be maintained at 1.0 to 5.0 inches of water or ranges established during the latest stack test. Any reading outside this range shall sound an alarm/alert function for immediate response by maintenance personnel to shut the unit down until the situation is remedied. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.1.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.8 Record Keeping Requirement

- (a) To document compliance with Condition D.1.5(a), (b), and (c), the Permittee shall maintain records of daily visible emission notations of the stack exhaust from 197, 200, 208, 210, 258 to 261, 265 to 277, and 356A to 356D. The Permittee shall include in its daily record when a visible emission reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the daily automatic or manual readings of the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses differential pressure. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.1, the Permittee shall maintain records of the input of silane binder to the tire curing process and Banbury mixing area. Records shall include inventory usage records, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of binder used.

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

D.1.9 Reporting Requirement

An annual summary of the information used to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the year being reported.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Four (4) natural gas or No. 2/No. 6 fuel oil or fuel oil blend fired boilers, identified as #1, #2, #3, (constructed in 1961), and #5 (constructed in 1974), with maximum capacities of 52, 52, 52, and 130 million British thermal units per hour (MMBtu/hr), respectively, using no control. Boilers #1 and #2 exhaust at stack 109, boiler #3 exhausts at stack 114, and boiler #5 exhausts at stack 257.

(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 2-7-5(1)]

D.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from Boiler #1 through #3 and #5 shall be limited as follows:

- (a) one and six tenths (1.6) pounds per MMBtu heat input when combusting No. 6 fuel oil, or
(b) five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil.

D.2.2 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) the PM emissions from Boilers #1 through #3 shall each be limited to 0.61 pounds per MMBtu heat input, and the PM emissions from Boiler #5 shall be limited to 0.45 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee shall conduct stack testing for opacity when burning No.6 fuel oil in Boiler #5. Compliance shall be determined by a performance stack test conducted in accordance with Section C - Performance Testing. The Permittee shall perform opacity testing utilizing Method 9 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The opacity testing shall be repeated at least once every two and one half (2 1/2) years from February 8, 2006.

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.2.1 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate the fuel oil sulfur content does not exceed one and five tenths percent (1.5%) by weight or one and six tenths (1.6) pounds per MMBtu heat input (No. 6 fuel oil) or five tenths (0.5) pounds per MMBtu heat input (No. 2 fuel oil) by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the boiler#1 through #3 and #5 stack exhaust shall be performed once per day during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be

taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.2.1.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the boiler #1-#3, and boiler #5 stack exhaust while combusting fuel oil. The Permittee shall include in its daily record when a visible emission reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) component preparation area, identified as EU-03, which includes milling, extruding, and calendaring, constructed prior to 1974 with one mill constructed in 2007, with a maximum capacity of 49,420 pounds per hour for milling and 48,378 pounds per hour for calendaring and extruding, using no control, exhausting at stacks 173, 174, 186, 254, 255, 318, 324, 325, 326, 327, 328, 329, 330, and 415. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (e) One (1) tire building area, constructed in 1961, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stack 279. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (f) One (1) tire curing process, identified as EU-05, with 178 presses constructed in 1961 and modified in 2004, and 26 presses approved for construction in 2007, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stacks 52-58, 61-66, 69, 71, 73, 75, 77, 79, 80, and 83-88. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (h) One (1) tread end cementing process consisting of lines #1 and #2, identified as EU-04, with a maximum production capacity of 2,081 tires per hour or 33,646 pounds per hour, constructed in 1961 and modified in 1990 and 1996, using particulate baffle filters, exhausting to one of the four process boilers to control VOC. This unit is an affected facility under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (i) Miscellaneous solvent usage.

Insignificant Activities:

- (b) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (c) One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.

(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 2-7-5(1)]

D.3.1 PSD Minor Limits [326 IAC 2-2]

- (a) VOC emissions from the twenty-six (26) curing presses installed under SPM 003-24944-00008 and SSM 003-24784-00008 shall not exceed 0.67 lb VOC per ton rubber cured.
- (b) Total rubber cured in the twenty-six (26) curing presses installed under SPM 003-24944-00008 and SSM 003-24784-00008 shall not exceed 25,575 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) VOC emissions from the Tread End Cementers shall be directed to either one of the four (4) process boilers for destruction in order to achieve a reduction in the VOC emissions by 2 tons per twelve (12) month period.

- (d) Silane binder shall not be used on any curing press approved for construction under significant source modification No. 003-24784-00008 and operation under significant permit modification No. 003-24944-00008. Specifically, silane binder shall not be used in curing presses F01 to F20 and J11 to J16.

Compliance with this condition shall render the requirements of 326 IAC 2-2, Prevention of Significant Deterioration not applicable to SSM 003-20073-00008 and SPM 003-21271-00008, SSM 003-24784-00008 and SPM 003-24944-00008, as well as SSM 003-26320-00008 and SPM 003-26647-00008, respectively.

D.3.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, particulate emissions from the tread end cementing operations shall not exceed 27.1 pounds per hour when operating at a process weight of 33,646 pounds per hour.

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:

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

- (b) Pursuant to 326 IAC 6-3-2, particulate emissions from the protectant spray operation shall be controlled by particulate baffle filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (c) Pursuant to 326 IAC 6-3-2(d), particulate emissions from each of the green tire spraying booths shall be controlled by particulate baffle filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 2-7-6(6)]

In order to comply with Condition D.3.2, the baffle filters for particulate control shall be in operation and control emissions at all times the tread end cementers are in operation.

D.3.5 Volatile Organic Compounds (VOC)

The Permittee shall operate either one of the four boilers to control the Tread End Cementers at all times in order to achieve compliance with condition D.3.1.

D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.3.1(a) and (c), the Permittee shall conduct a performance test to verify the capture system and VOC emission reduction from the Tread End Cementers controlled by either one of the four (4) process boilers utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing. This test shall be repeated at least once every five (5) years from February 8-14, 2006, the date of the most recent valid compliance demonstration.

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

D.3.7 Boilers Operating Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on either one of the four boilers used to control VOC emissions from the Tread End Cementing operation for measuring operating temperature. For the purpose of this condition,

continuous means no less than once per minute. The output of this system shall be recorded as three (3) hour average. The Permittee shall take appropriate response steps in accordance with Section C – Response to Excursions and Exceedances whenever the three (3) hour average temperature of the boiler used to control emissions from the Tread End Cementers is below 951°F until a temperature is established during the latest stack test, is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance the VOC emission reduction in Condition D.3.1 as approved by IDEM. This temperature shall be used for compliance with condition D.3.7(a).
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of either of the four boilers used is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.8 Parametric Monitoring [40 CFR 64]

The Permittee shall record the fan amperage of the capture system used in conjunction with the tread end cementer at least once per day when the tread end cementing process is in operation. When for any one reading, the fan amperage is outside the normal operating range of 6.8 to 7.2 amps or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A fan amperage that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.9 Record Keeping Requirement

- (a) To document compliance with Conditions D.3.7 and D.3.8, the Permittee shall maintain records in accordance with (1) and (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emissions limit in Condition D.3.1.
 - (1) The continuous temperature records (reduced to a three-hour average basis) from any of the four boilers that controls the VOC emissions from the Tread End. Cementers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Daily record of the duct pressure, fan amperage, or air flow.
 - (3) The Permittee shall include in its daily record when a temperature, duct pressure, fan amperage, or air flow reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (b) To document compliance with D.3.1(b), the Permittee shall maintain a record of the total tons of rubber cured on the twenty-six (26) curing presses installed under SPM 003-24944-00008 and SSM 003-24784-00008.

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

D.3.10 Reporting Requirements

An annual summary of the information used to document compliance with Condition D.3.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the year being reported.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

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

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) component preparation area, identified as EU-03, which includes milling, extruding, and calendaring, constructed prior to 1974 with one mill constructed in 2007, with a maximum capacity of 49,420 pounds per hour for milling and 48,378 pounds per hour for calendaring and extruding, using no control, exhausting at stacks 173, 174, 186, 254, 255, 318, 324, 325, 326, 327, 328, 329, 330, and 415. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (e) One (1) tire building area, constructed in 1961, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stack 279. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (f) One (1) tire curing process, identified as EU-05, with 178 presses constructed in 1961 and modified in 2004, and 26 presses approved for construction in 2007, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stacks 52-58, 61-66, 69, 71, 73, 75, 77, 79, 80, and 83-88. This unit is an affected facility under 40 CFR 63, Subpart XXXX.
- (h) One (1) tread end cementing process consisting of lines #1 and #2, identified as EU-04, with a maximum production capacity of 2,081 tires per hour or 33,646 pounds per hour, constructed in 1961 and modified in 1990 and 1996, using particulate baffle filters, exhausting to one of the four process boilers to control VOC. This unit is an affected facility under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (i) Miscellaneous solvent usage.

Insignificant Activities:

- (b) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (c) One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.5980, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the affected facilities, as specified in Table 17 of 40 CFR Part 63, Subpart XXXX in accordance with schedule in 40 CFR 63, Subpart XXXX.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing
[40 CFR Part 63, Subpart XXXX]

Pursuant to 40 CFR Part 63, Subpart XXXX, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart XXXX for the affected facility described below, as specified as follows on and after July 11, 2005.

The following emission units comprise the affected source that is subject to 40 CFR 63, Subpart XXXX:

- (1) One (1) component preparation area, which includes milling, extruding, and calendaring, constructed prior to 1974, with a maximum capacity of 49,420 pounds per hour for milling and 48,378 pounds per hour for calendaring and extruding, using no control, exhausting at stacks 173, 174, 186, 254, 255, 318, 324, 325, 326, 327, 328, 329, 330 including one (1) stand-alone mill, which is to be constructed and operated in 2007. This new mill will exhaust at stack 415. This unit is an affected unit under 40 CFR 63, Subpart XXXX.
- (2) One (1) tire building area, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stacks 301-309, 312, and 313. This unit is an affected unit under 40 CFR 63, Subpart XXXX.
- (3) One (1) tire curing process, constructed in 1961, modified in 2004, and 26 presses approved for construction in 2007, with a maximum capacity of 47,290 pounds per hour, using no control, exhausting at stacks 52-58, 61-66, 69, 71, 73, 75, 77, 79, 80, and 83-88. This unit is an affected unit under 40 CFR 63, Subpart XXXX.
- (4) One (1) tread end cementing process consisting of lines #1 and #2, with a production capacity of 2,081 tires per hour, using particulate baffle filters, exhausting to one of the four (4) process boilers to control VOC emissions. Line #1 was modified in 1996; Line #2 was modified in 1990. This unit is an affected unit under 40 CFR 63, Subpart XXXX and 40 CFR 60, Subpart BBB.
- (5) Miscellaneous solvent usage.
- (6) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 63, Subpart XXXX and 40 CFR 60, Subpart BBB.
- (7) One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.

Subpart XXXX—National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing

Source: 67 FR 45598, July 9, 2002, unless otherwise noted.

What This Subpart Covers

§ 63.5980 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for rubber tire manufacturing. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§ 63.5981 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a rubber tire manufacturing facility that is located at, or is a part of, a major source of hazardous air pollutant (HAP) emissions.

(1) Rubber tire manufacturing includes the production of rubber tires and/or the production of components integral to rubber tires, the production of tire cord, and the application of puncture sealant. Components of rubber tires include, but are not limited to, rubber compounds, sidewalls, tread, tire beads, tire cord and liners. Other components often associated with rubber tires but not integral to the tire, such as wheels, inner tubes, tire bladders, and valve stems, are not components of rubber tires or tire cord and are not subject to this subpart.

(2) A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

§ 63.5982 What parts of my facility does this subpart cover?

(a) This subpart applies to each existing, new, or reconstructed affected source at facilities engaged in the manufacture of rubber tires or their components.

(b) The affected sources are defined in paragraph (b)(1) of this section (tire production), paragraph (b)(2) of this section (tire cord production), paragraph (b)(3) of this section (puncture sealant application), and paragraph (b)(4) of this section (rubber processing).

(1) The tire production affected source is the collection of all processes that use or process cements and solvents as defined in §63.6015, located at any rubber tire manufacturing facility. It includes, but is not limited to: Storage and mixing vessels and the transfer equipment containing cements and/or solvents; wastewater handling and treatment operations; tread and cement operations; tire painting operations; ink and finish operations; undertread cement operations; process equipment cleaning materials; bead cementing operations; tire building operations; green tire spray operations; extruding, to the extent cements and solvents are used; cement house operations; marking operations; calendar operations, to the extent solvents are used; tire striping operations; tire repair operations; slab dip operations; other tire building operations, to the extent that cements and solvents are used; and balance pad operations.

(4) The rubber processing affected source is the collection of all rubber mixing processes (e.g., banburys and associated drop mills) that either mix compounds or warm rubber compound before the compound is processed into components of rubber tires. The mixed rubber compound itself is also included in the rubber processing affected source. There are no emission limitations or other requirements for the rubber processing affected source.

(e) An affected source is existing if it is not new or reconstructed.

§ 63.5983 When do I have to comply with this subpart?

(b) If you have an existing affected source, you must comply with the emission limitations for existing sources no later than July 11, 2005.

Emission Limits for Tire Production Affected Sources

§ 63.5984 What emission limits must I meet for tire production affected sources?

You must meet each emission limit in either option 1 or option 2 of Table 1 to this subpart that applies to you.

§ 63.5985 What are my alternatives for meeting the emission limits for tire production affected sources?

You must use one of the compliance alternatives in paragraphs (a) through (c) of this section to meet either of the emission limits in §63.5984.

(b) *Monthly average alternative, without using an add-on control device.* Use cements and solvents in such a way that the monthly average HAP emissions do not exceed the emission limits in Table 1 to this subpart, option 1 or option 2.

General Compliance Requirements

§ 63.5990 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the applicable emission limitations specified in Tables 1 through 4 to this subpart at all times, except during periods of startup, shutdown, and malfunction if you are using a control device to comply with an emission limit.

(b) Except as provided in §63.5982(b)(4), you must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

[67 FR 45598, July 9, 2002, as amended at 71 FR 20466, Apr. 20, 2006]

Testing and Initial Compliance Requirements for Tire Production Affected Sources

§ 63.5994 How do I conduct tests and procedures for tire production affected sources?

(a) *Methods to determine the mass percent of HAP in cements and solvents.* To determine the HAP content in the cements and solvents used at your tire production affected source, use EPA Method 311 of appendix A of this part, an approved alternative method, or any other reasonable means for determining the HAP content of your cements and solvents. Other reasonable means include, but are not limited to: a material safety data sheet (MSDS), provided it contains appropriate information; a certified product data sheet (CPDS); or a manufacturer's hazardous air pollutant data sheet. You are not required to test the materials that you use, but the Administrator may require a test using EPA Method 311 (or an approved alternative method) to confirm the reported HAP content. If the results of an analysis by EPA Method 311 are different from the HAP content determined by another means, the EPA Method 311 results will govern compliance determinations.

(b) *Methods to demonstrate compliance with the HAP constituent emission limits in Table 1 to this subpart (option 1).* Use the method in paragraph (b)(1) of this section to demonstrate initial and continuous compliance with the applicable emission limits for tire production affected sources using the compliance alternative described in §63.5985(a), purchase alternative. Use the equations in paragraphs (b)(2) and (3) of this section to demonstrate initial and continuous compliance with the emission limits for tire production affected sources using the monthly average compliance alternatives described in §63.5985(b) and (c).

(1) Determine the mass percent of each HAP in each cement and solvent according to the procedures in paragraph (a) of this section.

(2) Use Equation 1 of this section to calculate the HAP emission rate for each monthly operating period when complying by using cements and solvents without using an add-on control device so that the monthly average HAP emissions do not exceed the HAP constituent emission limits in Table 1 to this subpart, option 1. Equation 1 follows:

$$E_{\text{month}} = \frac{\left(\sum_{i=1}^n (HAP_i)(TMASS_i) \right) (10^6)}{\sum_{i=1}^n TMASS_i} \quad (\text{Eq. 1})$$

Where:

E_{month} =mass of the specific HAP emitted per total mass cements and solvents from all cements and solvents used in tire production per month, grams per megagram.

HAP_i =mass percent, expressed as a decimal, of the specific HAP in cement and solvent i , as purchased, determined in accordance with paragraph (a) of this section.

$TMASS_i$ =total mass of cement and solvent i used in the month, grams.

n =number of cements and solvents used in the month.

(d) *Specific compliance demonstration requirements for tire production affected sources.* (1) Conduct any required compliance demonstration according to the requirements in §63.5993.

(2) If you are demonstrating compliance with the HAP constituent option in Table 1 to this subpart, option 1, conduct the compliance demonstration using cements and solvents that are representative of cements and solvents typically used at your tire production affected source.

[67 FR 45598, July 9, 2002, as amended at 68 FR 11747, Mar. 12, 2003]

§ 63.5996 How do I demonstrate initial compliance with the emission limits for tire production affected sources?

(a) You must demonstrate initial compliance with each emission limit that applies to you according to Table 6 to this subpart.

(b) You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.6009(e).

Continuous Compliance Requirements for Tire Production Affected Sources

§ 63.6003 How do I monitor and collect data to demonstrate continuous compliance with the emission limits for tire production affected sources?

(a) You must monitor and collect data as specified in Table 9 to this subpart.

(b) Except for periods of monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must monitor continuously (or collect data at all required intervals) while the affected source is operating. This includes periods of startup, shutdown, and malfunction when the affected source is operating.

§ 63.6004 How do I demonstrate continuous compliance with the emission limits for tire production affected sources?

(a) You must demonstrate continuous compliance with each applicable limit in Table 1 to this subpart using the methods specified in Table 10 to this subpart.

(b) You must report each instance in which you did not meet an emission limit in Table 1 to this subpart. You must also report each instance in which you did not meet the applicable requirements in Table 10 to this subpart. These instances are deviations from the emission limits in this subpart. The deviations must be reported in accordance with the requirements in §63.6010(e).

Notifications, Reports, and Records

§ 63.6009 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.7 (b) and (c), 63.8(f) (4) and (6), and 63.9 (b) through (e) and (h) that apply to you by the dates specified.

(e) If you are required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 5 through 8 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). The Notification must contain the information listed in Table 15 to this subpart for compliance reports. The Notification of Compliance Status must be submitted according to the following schedules, as appropriate:

(1) For each initial compliance demonstration required in Tables 6 through 8 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.

(f) For each tire production affected source, the Notification of Compliance Status must also identify the emission limit option in §63.5984 and the compliance alternative in §63.5985 that you have chosen to meet.

§ 63.6010 What reports must I submit and when?

(a) You must submit each applicable report in Table 15 to this subpart.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 15 to this subpart and according to the requirements in paragraphs (b)(1) through (5) of this section.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting subparts pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain information specified in paragraphs (c)(1) through (10) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.

(3) Date of report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).

(5) If there are no deviations from any emission limitations (emission limit or operating limit) that applies to you, a statement that there were no deviations from the emission limitations during the reporting period.

(7) For each tire production affected source, the emission limit option in §63.5984 and the compliance alternative in §63.5985 that you have chosen to meet.

(d) For each deviation from an emission limitation (emission limit or operating limit) that occurs at an affected source where you are not using a CPMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) and paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction when the affected source is operating.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) and the corrective action taken.

(e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report (pursuant to Table 10 to this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A) which includes all required information concerning deviations from any emission limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of

a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

(g) If acceptable to both the Administrator and you, you may submit reports and notifications electronically.

§ 63.6011 What records must I keep?

(a) You must keep the records specified in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) Records of performance tests as required in §63.10(b)(2)(viii).

(3) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(b) For each tire production affected source, you must keep the records specified in Table 9 to this subpart to show continuous compliance with each emission limit that applies to you.

§ 63.6012 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

Other Requirements and Information

§ 63.6013 What parts of the General Provisions apply to me?

Table 17 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

§ 63.6014 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the United States Environmental Protection Agency, or a delegated authority such as your State, local, or tribal agency. If the U.S. EPA has delegated authority to your State, local, or tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. You should contact your U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the Administrator of the U.S. EPA and are not transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the requirements in §§63.5981 through 63.5984, 63.5986, and 63.5988.

(2) Approval of major changes to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major changes to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.6015 What definitions apply to this subpart?

Terms used in this subpart are defined in the Clean Air Act and in §63.2, the General Provisions. The following are additional definitions of terms used in this subpart:

As purchased means the condition of a cement and solvent as delivered to the facility, prior to any mixing, blending, or dilution.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions into a closed-vent system that conveys these emissions to a control device.

Cements and solvents means the collection of all organic chemicals, mixtures of chemicals, and compounds used in the production of rubber tires, including cements, solvents, and mixtures used as process aids. Cements and solvents include, but are not limited to, tread end cements, undertread cements, bead cements, tire building cements and solvents, green tire spray, blemish repair paints, side wall protective paints, marking inks, materials used to clean process equipment, and slab dip mixtures. Cements and solvents do not include coatings or process aids used in tire cord production, puncture sealant application, rubber processing, or materials used to construct, repair, or maintain process equipment, or chemicals and compounds that are not used in the tire production process such as materials used in routine janitorial or facility grounds maintenance, office supplies (e.g., dry-erase markers, correction fluid), architectural paint, or any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution to and use by the general public.

Coating means a compound or mixture of compounds that is applied to a fabric substrate in the tire cord production operation that allows the fabric to be prepared (e.g., by heating, setting, curing) for incorporation into a rubber tire.

Components of rubber tires means any piece or part used in the manufacture of rubber tires that becomes an integral portion of the rubber tire when manufacture is complete and includes mixed rubber compounds, sidewalls, tread, tire beads, and liners. Other components often associated with rubber tires such as wheels, valve stems, tire bladders and inner tubes are not considered components of rubber tires for the purposes of these standards. Tire cord and puncture sealant, although components of rubber tires, are considered as separate affected sources in these standards and are defined separately.

Control device means a combustion device, recovery device, recapture device, or any combination of these devices used for recovering or oxidizing organic hazardous air pollutant vapors. Such equipment includes, but is not limited to, absorbers, carbon adsorbers, condensers, incinerators (oxidizers), flares, boilers, and process heaters.

Control system efficiency means the percent of total volatile organic compound emissions, as measured by EPA Method 25 or 25A (40 CFR part 60, appendix A), recovered or destroyed by a control device multiplied by the percent of total volatile organic compound emissions, as measured by Method 25 or 25A, that are captured and conveyed to the control device.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any emission limitation (including any operating limit) or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limitation (including any operating limit) or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means any emission limit, opacity limit, operating limit, or visible emission limit.

Fabric processed means the amount of fabric coated and finished for use in subsequent product manufacturing.

Mixed rubber compound means the material, commonly referred to as rubber, from which rubber tires and components of rubber tires are manufactured. For the purposes of this definition, mixed rubber compound refers to the compound that leaves the rubber mixing process (e.g., banburys) and is then processed into components from which rubber tires are manufactured.

Monthly operating period means the period in the Notification of Compliance Status report comprised of the number of operating days in the month.

Operating day means the period defined in the Notification of Compliance Status report. It may be from midnight to midnight or a portion of a 24-hour period.

Process aid means a solvent, mixture, or cement used to facilitate or assist in tire component identification; component storage; tire building; tire curing; and tire repair, finishing, and identification.

Puncture sealant means a mixture that may include, but is not limited to, solvent constituents, mixed rubber compound, and process oil that is applied to the inner liner of a finished tire for the purpose of sealing any future hole which might occur in the tread when an object penetrates the tire.

Responsible official means responsible official as defined in 40 CFR 70.2.

Rubber means the sum of the materials (for example, natural rubber, synthetic rubber, carbon black, oils, sulfur) that are combined in specific formulations for the sole purpose of making rubber tires or components of rubber tires.

Rubber mixing means the physical process of combining materials for use in rubber tire manufacturing to make mixed rubber compound using the collection of banburys and associated drop mills.

Rubber tire means a continuous solid or pneumatic cushion typically encircling a wheel and usually consisting, when pneumatic, of an external rubber covering.

Rubber used means the total mass of mixed rubber compound delivered to the tire production operations in a tire manufacturing facility (e.g., the collection of warm-up mills, extruders, calendars, tire building, or other tire component and tire manufacturing equipment).

Tire cord means any fabric (e.g., polyester, cotton) that is treated with a coating mixture that allows the fabric to more readily accept impregnation with rubber to become an integral part of a rubber tire.

[67 FR 45598, July 9, 2002, as amended at 68 FR 11747, Mar. 12, 2003]

Table 1 to Subpart XXXX of Part 63—Emission Limits for Tire Production Affected Sources

As stated in §63.5984, you must comply with the emission limits for each new, reconstructed, or existing tire production affected source in the following table:

For each . . .	You must meet the following emission limits.
1. Option 1— HAP constituent option	a. Emissions of each HAP in Table 16 to this subpart must not exceed 1,000 grams HAP per megagram (2 pounds per ton) of total cements and solvents used at the tire production affected source, and b. Emissions of each HAP not in Table 16 to this subpart must not exceed 10,000 grams HAP per megagram (20 pounds per ton) of total cements and solvents used at the tire production affected source.

Table 6 to Subpart XXXX of Part 63—Initial Compliance With the Emission Limits for Tire Production Affected Sources

As stated in §63.5996, you must show initial compliance with the emission limits for tire production affected sources according to the following table:

For . . .	For the following emission limit . . .	You have demonstrated initial compliance if . . .
2. Sources complying with the monthly average compliance alternative without using a control device in §63.5985(b)	The HAP constituent option in Table 1 to this subpart, option 1	You demonstrate that the monthly average HAP emissions for each monthly operating period do not exceed the emission limits in Table 1 to this subpart, option 1, determined according to the applicable procedures in §63.5994(a) and (b)(2).

Table 9 to Subpart XXXX of Part 63—Minimum Data for Continuous Compliance With the Emission Limits for Tire Production Affected Sources

As stated in §63.6003, you must maintain minimum data to show continuous compliance with the emission limits for tire production affected sources according to the following table:

For . . .	You must maintain . . .
2. Sources complying with the monthly average compliance alternative without using a control device according to §63.5985(b) that are meeting emission limits in Table 1 to this subpart	a. A record of Method 311, or approved alternative method, test results, indicating the mass percent of each HAP for each cement and solvent, as purchased. b. The mass of each cement and solvent used each monthly operating period. c. The total mass of rubber used each monthly operating period (if complying with the production-based emission limit, option 2, in Table 1 to this subpart). d. All data and calculations used to determine the monthly average mass percent for each HAP for each monthly operating period. e. Monthly averages of emissions in the appropriate emission limit format.

Table 10 to Subpart XXXX of Part 63—Continuous Compliance With the Emission Limits for Tire Production Affected Sources

As stated in §63.6004, you must show continuous compliance with the emission limits for tire production affected sources according to the following table:

For . . .	For the following emission limit . . .	You must demonstrate continuous compliance by . . .
2. Sources complying with the monthly average compliance alternative without using a control device according to §63.5985(b)	The HAP constituent option in Table 1 to this subpart, option 1	Demonstrating that the monthly average HAP emissions for each monthly operating period do not exceed the emission limits in Table 1 to this subpart, option 1, determined according to the applicable procedures in §63.5994(a) and (b)(2).

Table 15 to Subpart XXXX of Part 63—Requirements for Reports

As stated in §63.6010, you must submit each report that applies to you according to the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. If there are no deviations from any emission limitations that apply to you, a statement that there were no deviations from the emission limitations during the reporting period. If there were no periods during which the CPMS was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period	Semiannually according to the requirements in §63.6010(b), unless you meet the requirements for annual reporting in §63.6010(f).
	b. If you have a deviation from any emission limitation during the reporting period at an affected source where you are not using a CPMS, the report must contain the information in §63.6010(d). If the deviation occurred at a source where you are using a CPMS or if there were periods during which the CPMS were out-of-control as specified in §63.8(c)(7), the report must contain the information required by §63.5990(f)(3)	Semiannually according to the requirements in §63.6010(b), unless you meet the requirements for annual reporting in §63.6010(f).
	c. If you had a startup, shutdown or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i)	Semiannually according to the requirements in §63.6010(b), unless you meet the requirements for annual reporting in §63.6010(f).
2. Immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the

You must submit a(n)	The report must contain . . .	You must submit the report . . .
during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.		plan.
	b. The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority (§63.10(d)(5)(ii)).

Table 16 to Subpart XXXX of Part 63—Selected Hazardous Air Pollutants

You must use the information listed in the following table to determine which emission limit in the HAP constituent options in Tables 1 through 3 to this subpart is applicable to you:

CAS No.	Selected hazardous air pollutants
50000	Formaldehyde
51796	Ethyl carbamate (Urethane)
53963	2-Acetylaminofluorene
56235	Carbon tetrachloride
57147	1,1-Dimethyl hydrazine
57578	beta-Propiolactone
58899	Lindane (all isomers)
59892	N-Nitrosomorpholine
60117	Dimethyl aminoazobenzene
62759	N-Nitrosodimethylamine
64675	Diethyl sulfate
67663	Chloroform
67721	Hexachloroethane
71432	Benzene (including benzene from gasoline)
75014	Vinyl chloride
75070	Acetaldehyde
75092	Methylene chloride (Dichloromethane)
75218	Ethylene oxide
75558	1,2-Propylenimine (2-Methyl aziridine)

CAS No.	Selected hazardous air pollutants
75569	Propylene oxide
77781	Dimethyl sulfate
79061	Acrylamide
79447	Dimethyl carbamoyl chloride
79469	2-Nitropropane
88062	2,4,6-Trichlorophenol
91941	3,3-Dichlorobenzidene
92671	4-Aminobiphenyl
92875	Benzidine
95534	o-Toluidine
95807	2,4-Toluene diamine
96128	1,2-Dibromo-3-chloropropane
96457	Ethylene thiourea
98077	Benzotrichloride
101144	4,4-Methylene bis(2-chloroaniline)
101779	4,4-Methylenedianiline
106467	1,4-Dichlorobenzene(p)
106898	Epichlorohydrin (1-Chloro-2,3-epoxypropane)
106934	Ethylene dibromide (Dibromoethane)
106990	1,3-Butadiene
107062	Ethylene dichloride (1,2-Dichloroethane)
107131	Acrylonitrile
107302	Chloromethyl methyl ether
117817	Bis(2-ethylhexyl)phthalate (DEHP)
118741	Hexachlorobenzene
119904	3,3-Dimethoxybenzidine
119937	3,3-Dimethyl benzidine
122667	1,2-Diphenylhydrazine
123911	1,4-Dioxane (1,4-Diethyleneoxide)
127184	Tetrachloroethylene (Perchloroethylene)
140885	Ethyl acrylate

CAS No.	Selected hazardous air pollutants
302012	Hydrazine
542756	1,3-Dichloropropene
542881	Bis(chloromethyl)ether
680319	Hexamethylphosphoramide
684935	N-Nitroso-N-methylurea
1120714	1,3-Propane sultone
1332214	Asbestos
1336363	Polychlorinated biphenyls (Aroclors)
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin
8001352	Toxaphene (chlorinated camphene)
	Arsenic Compounds
	Chromium Compounds
	Coke Oven Emissions

Table 17 to Subpart XXXX of Part 63—Applicability of General Provisions to This Subpart XXXX
 As stated in §63.6013, you must comply with the applicable General Provisions (GP) requirements according to the following table:

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions; notifications	Yes	Yes.
§63.2	Definitions	Definitions for part 63 standards	Yes	Yes.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes	Yes.
§63.4	Prohibited Activities	Prohibited activities; compliance date; circumvention; severability	Yes	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes	Yes.
§63.6(a)	Applicability	GP apply unless compliance extension; GP apply to area sources that become major	Yes	Yes.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.6(b)(1)–(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for section 112(f)	Yes	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes	Yes.
§63.6(b)(6)	[Reserved]			
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources that Become Major		No	No.
§63.6(c)(1)–(2)	Compliance Dates for Existing Sources	Comply according to date in subpart, which must be no later than 3 years after effective date; for CAA section 112(f) standards, comply within 90 days of effective date unless compliance extension	Yes	Yes.
§63.6(c)(3)–(4)	[Reserved]			
§63.6(c)(5)	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in subpart or by equivalent time period (for example, 3 years)	Yes	Yes.
§63.6(d)	[Reserved]			
§63.6(e)(1)–(2)	Operation & Maintenance	Operate to minimize emissions at all times; correct malfunctions as soon as practicable; and operation and maintenance requirements independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met	Yes	Yes.
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan (SSMP)		Yes	No.
§63.6(f)(1)	Compliance Except During SSM		Yes	No.
§63.6(f)(2)–(3)	Methods for Determining Compliance	Compliance based on performance test; operation and maintenance plans; records; inspection	Yes	Yes.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.6(g)(1)–(3)	Alternative Standard	Procedures for getting an alternative standard	Yes	Yes.
§63.6(h)	Opacity/Visible Emission (VE) Standards		No	No.
§63.6(i)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt source category from requirement to comply with rule	Yes	Yes.
§63.7(a)(1)–(2)	Performance Test Dates		No	No.
§63.7(a)(3)	CAA section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes	No.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes	No.
§63.7(b)(2)	Notification of Rescheduling	If rescheduling a performance test is necessary, must notify Administrator 5 days before scheduled date of rescheduled date	Yes	No.
§63.7(c)	Quality Assurance/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with: test plan approval procedures; performance audit requirements; and internal and external quality assurance procedures for testing	Yes	No.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes	No.
§63.7(e)(1)	Conditions for Conducting Performance Tests	Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM; not a violation to exceed standard during SSM	Yes	No.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to rule and EPA test methods unless Administrator approves alternative	Yes	No.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.7(e)(3)	Test Run Duration	Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; and conditions when data from an additional test run can be used	Yes	No.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an alternative test method	Yes	No.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the Notification of Compliance Status report; and keep data for 5 years	Yes	No.
§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes	No.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes	Yes.
§63.8(a)(2)	Performance Specifications	Performance Specifications in appendix B of 40 CFR part 60 apply	Yes	No.
§63.8(a)(3)	[Reserved]			
§63.8(a)(4)	Monitoring with Flares		No	No.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes	Yes.
§63.8(b)(2)–(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each effluent before it is combined and before it is released to the atmosphere unless Administrator approves otherwise; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	Yes	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with good air pollution control practices	Applies as modified by §63.5990(e) and (f)	No.
§63.8(c)(1)(i)	Routine and Predictable SSM		No	No.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.8(c)(1)(ii)	SSM not in SSMP		No	No.
§63.8(c)(1)(iii)	Compliance with Operation and Maintenance Requirements	How Administrator determines if source complying with operation and maintenance requirements; review of source operation and maintenance procedures, records, manufacturer's instructions, recommendations, and inspection of monitoring system	Yes	Yes.
§63.8(c)(2)–(3)	Monitoring System Installation	Must install to get representative emission and parameter measurements; must verify operational status before or at performance test	Yes	No.
§63.8(c)(4)	Continuous Monitoring System (CMS) Requirements		Applies as modified by §63.5990(f)	No.
§63.8(c)(5)	Continuous Opacity Monitoring Systems (COMS) Minimum Procedures		No	No.
§63.8(c)(6)	CMS Requirements		Applies as modified by §63.5990(e)	No.
§63.8(c)(7)–(8)	CMS Requirements	Out-of-control periods, including reporting	Yes	No.
§63.8(d)	CMS Quality Control		Applies as modified by §63.5990(e) and (f)	No.
§63.8(e)	CMS Performance Evaluation		No	No.
§63.8(f)(1)–(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	Yes	Yes.
§63.8(f)(6)	Alternative to Relative Accuracy Test		No	No.
§63.8(g)	Data Reduction		Applies as modified by §63.5990(f)	No.
§63.9(a)	Notification Requirements	Applicability and state delegation	Yes	Yes.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.9(b)(1)-(5)	Initial Notifications	Submit notification 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construct/reconstruct, notification of startup; and contents of each	Yes	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate	Yes	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Source	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes	Yes.
§63.9(e)	Notification of Performance Test	Notify Administrator 60 days prior	Yes	No.
§63.9(f)	Notification of VE/Opacity Test	No	No	
§63.9(g)	Additional Notifications When Using CMS	No	No	
§63.9(h)	Notification of Compliance Status	Contents; due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes	Yes.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change in when notifications must be submitted	Yes	Yes.
§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes	Yes.
§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than 1 source	Yes	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General Requirements; keep all records readily available; and keep for 5 years.	Yes	Yes.
§63.10(b)(2)(i)-(iv)	Records related to Startup, Shutdown, and Malfunction.	Yes	No	

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.10(b)(2)(vi) and (x)–(xi)	CMS Records	Malfunctions, inoperative, out-of-control; calibration checks; adjustments, maintenance	Yes	No.
§63.10(b)(2)(vii)–(ix)	Records	Measurements to demonstrate compliance with emission limitations; performance test, performance evaluation, and visible emission observation results; and measurements to determine conditions of performance tests and performance evaluations	Yes	Yes.
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes	Yes.
§63.10(b)(2)(xiii)	Records		No	No.
§63.10(b)(2)(xiv)	Records	All documentation supporting Initial Notification and Notification of Compliance Status	Yes	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes	Yes.
§63.10(c)	Records		No	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes	Yes.
§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes	No.
§63.10(d)(3)	Reporting Opacity or VE Observations		No	No.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes	Yes.
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports		Yes	No.
§63.10(e)	Additional CMS Reports		No	No.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for Administrator to waive	Yes	Yes.
§63.11	Flares		No	No.
§63.12	Delegation	State authority to enforce standards	Yes	Yes.

Citation	Subject	Brief description of applicable sections	Applicable to Subpart XXXX?	
			Using a control device	Not using a control device
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes	Yes.
§63.14	Incorporation by Reference	Test methods incorporated by reference	Yes	Yes.
§63.15	Availability of Information	Public and confidential information	Yes	Yes.

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) One (1) tread end cementing process consisting of lines #1 and #2, with a production capacity of 2,081 tires per hour, using particulate baffle filters, exhausting at stacks 158 and 159. Line #1 was modified in 1996; Line #2 was modified in 1990. This unit is an affected unit under 40 CFR 63, Subpart XXXX and 40 CFR 60, Subpart BBB.

Insignificant Activities:

- (b) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 63, Subpart XXXX and 40 CFR 60, Subpart BBB.
- (c) One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.

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

New Source Performance Standards (NSPS) Requirements

E.2.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the units described in this section, except when otherwise specified in 40 CFR Part 60, Subpart BBB.

E.2.2 NSPS for Rubber Tire Manufacturing Requirements [40 CFR Part 60.500, Subpart BBB]

Pursuant to CFR Part 60, Subpart BBB, the Permittee shall comply with the provisions of 40 CFR Part 60.540, for the tread end cementing and green tire spray operations as specified below.

Subpart BBB—Standards of Performance for the Rubber Tire Manufacturing Industry

Source: 52 FR 34874, Sept. 15, 1987, unless otherwise noted.

§ 60.540 Applicability and designation of affected facilities.

(a) The provisions of this subpart, except as provided in paragraph (b) of this section, apply to each of the following affected facilities in rubber tire manufacturing plants that commence construction, modification, or reconstruction after January 20, 1983: each undertread cementing operation, each sidewall cementing operation, each tread end cementing operation, each bead cementing operation, each green tire spraying operation, each Michelin-A operation, each Michelin-B operation, and each Michelin-C automatic operation.

(c) Although the affected facilities listed under §60.540(a) are defined in reference to the production of components of a "tire," as defined under §60.541(a), the percent emission reduction requirements and VOC use cutoffs specified under §60.542(a)(1), (2), (6), (7)(iii), (7)(iv), (8), (9), and (10) refer to the total amount of VOC used (the amount allocated to the affected facility), including the VOC used in cements and organic solvent-based green tire spray materials for tire types not listed in the §60.541(a) definition of "tire."

[52 FR 34874, Sept. 15, 1987, as amended at 54 FR 38635, Sept. 19, 1989]

§ 60.541 Definitions.

(a) All terms that are used in this subpart and are not defined below are given the same meaning as in the Act and in subpart A of this part.

Bead means rubber-covered strands of wire, wound into a circular form, which ensure a seal between a tire and the rim of the wheel onto which the tire is mounted.

Bead cementing operation means the system that is used to apply cement to the bead rubber before or after it is wound into its final circular form. A bead cementing operation consists of a cement application station, such as a dip tank, spray booth and nozzles, cement trough and roller or swab applicator, and all other equipment necessary to apply cement to wound beads or bead rubber and to allow evaporation of solvent from cemented beads.

Component means a piece of tread, combined tread/sidewall, or separate sidewall rubber, or other rubber strip that is combined into the sidewall of a finished tire.

Drying area means the area where VOC from applied cement or green tire sprays is allowed to evaporate.

Enclosure means a structure that surrounds a VOC (cement, solvent, or spray) application area and drying area, and that captures and contains evaporated VOC and vents it to a control device. Enclosures may have permanent and temporary openings.

Green tire means an assembled, uncured tire.

Green tire spraying operation means the system used to apply a mold release agent and lubricant to the inside and/or outside of green tires to facilitate the curing process and to prevent rubber from sticking to the curing press. A green tire spraying operation consists of a booth where spraying is performed, the spray application station, and related equipment, such as the lubricant supply system.

Michelin-A operation means the operation identified as Michelin-A in the Emission Standards and Engineering Division confidential file as referenced in Docket A-80-9, Entry II-B-12.

Michelin-B operation means the operation identified as Michelin-B in the Emission Standards and Engineering Division confidential file as referenced in Docket A-80-9, Entry II-B-12.

Michelin-C-automatic operation means the operation identified as Michelin-C-automatic in the Emission Standards and Engineering Division confidential file as referenced in Docket A-80-9, Entry II-B-12.

Month means a calendar month or a prespecified period of 28 days or 35 days (utilizing a 4-4-5-week recordkeeping and reporting schedule).

Organic solvent-based green tire spray means any mold release agent and lubricant applied to the inside or outside of green tires that contains more than 12 percent, by weight, of VOC as sprayed.

Permanent opening means an opening designed into an enclosure to allow tire components to pass through the enclosure by conveyor or other mechanical means, to provide access for permanent mechanical or electrical equipment, or to direct air flow into the enclosure. A permanent opening is not equipped with a door or other means of obstruction of air flow.

Sidewall cementing operation means the system used to apply cement to a continuous strip of sidewall component or any other continuous strip component (except combined tread/sidewall component) that is incorporated into the sidewall of a finished tire. A sidewall cementing operation consists of a cement application station and all other equipment, such as the cement supply system and feed and takeaway conveyors, necessary to apply cement to sidewall strips or other continuous strip component (except combined tread/sidewall component) and to allow evaporation of solvent from the cemented rubber.

Temporary opening means an opening into an enclosure that is equipped with a means of obstruction, such as a door, window, or port, that is normally closed.

Tire means any agricultural, airplane, industrial, mobile home, light-duty truck and/or passenger vehicle tire that has a bead diameter less than or equal to 0.5 meter (m) (19.7 inches) and a cross section dimension less than or equal to 0.325 m (12.8 in.), and that is mass produced in an assembly-line fashion.

Tread end cementing operation means the system used to apply cement to one or both ends of the tread or combined tread/sidewall component. A tread end cementing operation consists of a cement application station and all other equipment, such as the cement supply system and feed and takeaway conveyors, necessary to apply cement to tread ends and to allow evaporation of solvent from the cemented tread ends.

Undertread cementing operation means the system used to apply cement to a continuous strip of tread or combined tread/sidewall component. An undertread cementing operation consists of a cement application station and all other equipment, such as the cement supply system and feed and takeaway conveyors, necessary to apply cement to tread or combined tread/sidewall strips and to allow evaporation of solvent from the cemented tread or combined tread/sidewall.

VOC emission control device means equipment that destroys or recovers VOC.

VOC emission reduction system means a system composed of an enclosure, hood, or other device for containment and capture of VOC emissions and a VOC emission control device.

Water-based green tire spray means any mold release agent and lubricant applied to the inside or outside of green tires that contains 12 percent or less, by weight, of VOC as sprayed.

(b) Notations used under this subpart are defined below:

B_o =total number of beads cemented at a particular bead cementing affected facility for a month

C_a =concentration of VOC in gas stream in vents after a control device (parts per million by volume)

C_b =concentration of VOC in gas stream in vents before a control device (parts per million by volume)

C_f =concentration of VOC in each gas stream vented directly to the atmosphere from an affected facility or from a temporary enclosure around an affected facility (parts per million by volume)

D_c =density of cement or spray material (grams per liter (lb per gallon))

D_r =density of VOC recovered by an emission control device (grams per liter (lb per gallon))

E =emission control device efficiency, inlet versus outlet (fraction)

F_c =capture efficiency, VOC captured and routed to one control device versus total VOC used for an affected facility (fraction)

F_o =fraction of total mass of VOC used in a month by all facilities served by a common cement or spray material distribution system that is used by a particular affected facility served by the common distribution system

G =monthly average mass of VOC used per tire cemented or sprayed with a water-based green tire spray for a particular affected facility (grams (lb) per tire)

G_b =monthly average mass of VOC used per bead cemented for a particular bead cementing affected facility (grams (lb) per bead)

L_c =volume of cement or spray material used for a month (liters (gallons))

L_r =volume of VOC recovered by an emission control device for a month (liters (gallons))

M =total mass of VOC used for a month by all facilities served by a common cement or spray material distribution system (grams (lb))

M_o =total mass of VOC used at an affected facility for a month (grams (lb))

M_r =mass of VOC recovered by an emission control device for a month (grams (lb))

N =mass of VOC emitted to the atmosphere per tire cemented or sprayed with a water-based green tire spray for an affected facility for a month (grams (lb) per tire)

N_b =mass of VOC emitted per bead cemented for an affected facility for a month (grams (lb) per bead)

Q_a =volumetric flow rate in vents after a control device (dry standard cubic meters (dry standard cubic feet) per hour)

Q_b =volumetric flow rate in vents before a control device (dry standard cubic meters (dry standard cubic feet) per hour)

Q_i =volumetric flow rate of each stream vented directly to the atmosphere from an affected facility or from a temporary enclosure around an affected facility (dry standard cubic meters (dry standard cubic feet) per hour)

R =overall efficiency of an emission reduction system (fraction)

T_d =total number of days in monthly compliance period (days)

T_o =total number of tires cemented or sprayed with water-based green tire sprays at a particular affected facility for a month

W_o =weight fraction of VOC in a cement or spray material.

[52 FR 34874, Sept. 15, 1987, as amended at 65 FR 61764, Oct. 17, 2000]

§ 60.542 Standards for volatile organic compounds.

(a) On and after the date on which the initial performance test, required by §60.8, is completed, but no later than 180 days after initial startup, each owner or operator subject to the provisions of this subpart shall comply with the following conditions:

(3) For each tread end cementing operation: Discharge into the atmosphere no more than 10 grams (0.022 lb) of VOC per tire cemented for each month.

(5) For each green tire spraying operation where only water-based sprays are used:

(i) Discharge into the atmosphere no more than 1.2 grams (0.0026 lb) of VOC per tire sprayed with an inside green tire spray for each month; and

(ii) Discharge into the atmosphere no more than 9.3 grams (0.021 lb) of VOC per tire sprayed with an outside green tire spray for each month.

[52 FR 34874, Sept. 15, 1987, as amended at 65 FR 61764, Oct. 17, 2000]

§ 60.543 Performance test and compliance provisions.

(a) Section 60.8(d) does not apply to the monthly performance test procedures required by this subpart. Section 60.8(d) does apply to initial performance tests and to the performance tests specified under paragraphs (b)(2) and (b)(3) of this section. Section 60.8(f) does not apply when Method 24 is used.

(b) Performance tests shall be conducted as follows:

(1) The owner or operator of an affected facility shall conduct an initial performance test, as required under §60.8(a), except as described under paragraph (j) of this section. The owner or operator of an affected facility shall thereafter conduct a performance test each month, except as described under paragraphs (b)(4), (g)(1), and (j) of this section. Initial and monthly performance tests shall be conducted according to the procedures in this section.

(c) For each undertread cementing operation, each sidewall cementing operation, each green tire spraying operation where organic solvent-based sprays are used, each Michelin-A operation, each Michelin-B operation, and each Michelin-C-automatic operation where the owner or operator seeks to comply with the uncontrolled monthly VOC use limits, the owner or operator shall use the following procedure to determine compliance with the applicable (depending upon duration of compliance period) uncontrolled monthly VOC use limit specified under §60.542(a) (1)(ii), (2)(ii), (6)(ii), (7)(iv), (8)(ii), (9)(ii), and (10)(ii). If both undertread cementing and sidewall cementing are performed at the same affected facility during a month, then the kg/mo limit specified under §60.542(a)(1)(ii) shall apply for that month.

(1) Determine the density and weight fraction VOC (including dilution VOC) of each cement or green tire spray from its formulation or by analysis of the cement or green tire spray using Method 24. If a dispute arises, the Administrator may require an owner or operator who used formulation data to analyze the cement or green tire spray using Method 24.

(2) Calculate the total mass of VOC used at the affected facility for the month (M_o) by the following procedure:

(i) For each affected facility for which cement or green tire spray is delivered in batch or via a distribution system that serves only the affected facility:

$$M_o = \sum_{i=1}^a L_{c_i} D_{c_i} W_{o_i}$$

Where:

“a” equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

(ii) For each affected facility for which cement or green tire spray is delivered via a common distribution system that also serves other affected or existing facilities:

(A) Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^b L_{c_i} D_{c_i} W_{o_i}$$

Where:

“b” equals the number of different cements or green tire sprays used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

(B) Determine the fraction (F_o) of M used at the affected facility by comparing the production records and process specifications for the material cemented or sprayed at the affected facility for the month to the production records and process specifications for the material cemented or sprayed at all other facilities served by the common distribution system for the month or by another procedure acceptable to the Administrator.

(C) Calculate the total monthly mass of VOC used at the affected facility for the month (M_o):

$$M_o = MF_o$$

(3) Determine the time duration of the monthly compliance period (T_d).

(l) In determining compliance for each undertread cementing operation, each sidewall cementing operation, each green tire spraying operation, each Michelin-A operation, each Michelin-B operation, and each Michelin-C-automatic operation, the owner or operator shall include all the VOC used, recovered, or destroyed from cements and organic solvent-based green tire sprays including those cements or sprays used for tires other than those defined under §60.541(a).

(m) In determining compliance for each tread end cementing operation, each bead cementing operation, and each green tire spraying operation, the owner or operator shall include only those tires defined under §60.541(a) when determining T_o and B_o .

[52 FR 34874, Sept. 15, 1987; 52 FR 37874, Oct. 9, 1987, as amended at 54 FR 38635, Sept. 19, 1989; 65 FR 61765, Oct. 17, 2000]

§ 60.545 Recordkeeping requirements.

(d) Each owner or operator of an undertread cementing operation, sidewall cementing operation, green tires spraying operation where organic solvent-based sprays are used, Michelin-A operation, Michelin-B

operation, or Michelin-C-automatic operation who seeks to comply with a specified VOC monthly usage limit shall maintain records of monthly VOC use and the number of days in each compliance period.

[52 FR 34874, Sept. 15, 1987, as amended at 54 FR 38637, Sept. 19, 1989; 65 FR 61765, Oct. 17, 2000]

§ 60.546 Reporting requirements.

(c) Each owner or operator subject to the provisions of this subpart shall report the results of all initial performance tests, as required under §60.8(a), and the results of the performance tests required under §60.543 (b)(2) and (b)(3). The following data shall be included in the report for each of the above performance tests:

(1) For each affected facility for which the owner or operator seeks to comply with a VOC monthly usage limit specified under §60.542(a): The monthly mass of VOC used (M_o) and the number of days in the compliance period (T_o).

(2) For each affected facility that seeks to comply with a VOC emission limit per tire or per bead specified under §60.542(a) without the use of a VOC emission reduction system: the mass of VOC used (M_o), the number of tires cemented or sprayed (T_o), the mass of VOC emitted per tire cemented or sprayed (N), the number of beads cemented (B_o), and the mass of VOC emitted per bead cemented (N_b).

[52 FR 34874, Sept. 15, 1987; 52 FR 37874, Oct. 9, 1987, as amended at 54 FR 38637, Sept. 19, 1989; 65 FR 61765, Oct. 17, 2000]

§ 60.547 Test methods and procedures.

(a) The test methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.542(a) as follows:

(1) Method 24 or formulation data for the determination of the VOC content of cements or green tire spray materials. In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement or green tire spray sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.

[52 FR 34874, Sept. 15, 1987, as amended at 54 FR 38638, Sept. 19, 1989; 65 FR 61765, Oct. 17, 2000]

§ 60.548 Delegation of authority.

(a) In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.

(b) Authority which will not be delegated to States: §60.543(c)(2)(ii)(B).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

Part 70 Annual Report

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008
Facility: Tire Curing Presses
Parameter: Total Tons of Tires Cured
(Presses installed by SM 003-24784-00008 and SPM 003-24944-00008)
Limit: Less than 25,575 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total Tons Cured This Month	Total Tons Cured Previous 11 Months	Total Tons Cured 12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			
Month 7			
Month 8			
Month 9			
Month 10			
Month 11			
Month 12			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Annual Report

Source Name: BF Goodrich Tire Manufacturing
 Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
 Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
 Part 70 Permit No.: T003-20341-00008
 Facility: Banbury Mixing Area and Tire Curing Process
 Parameter: Silane Binder Input
 Limit: Less than 467,800 lb per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Reporting Period	Column 1	Column 2	Column 1 + Column 2
	Silane Input This Month	Silane Input Previous 11 Months	Silane Input 12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			
Month 7			
Month 8			
Month 9			
Month 10			
Month 11			
Month 12			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008

Months: _____ to _____ Year: _____

Page 1 of 2

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

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**

**Addendum to the Technical Support Document (ATSD) for a
Part 70 Significant Permit and Significant Source Modification**

Source Background and Description
--

Source Name:	BF Goodrich Tire Manufacturing, Inc.
Source Location:	18906 Highway 24 East Woodburn, Indiana 46797
County:	Allen County
SIC Code:	3011
Operation Permit No.:	T 003-20341-00008
Operation Permit Issuance Date:	Anticipated in July 2008
Significant Permit Modification No.:	003-26647-00008
Significant Source Modification No.:	003-26320-00008
Permit Reviewer:	David J. Matousek

On July 14, 2008, the Office of Air Quality (OAQ) had a notice published in the Journal Gazette in Fort Wayne, Indiana 46802, stating that BF Goodrich Tire Manufacturing, Inc. had applied for a change in raw materials used in the Banbury mixing operation and the tire curing operation. BF Goodrich Tire Manufacturing applied to allow the use of silica and silane binder in the mixing and curing operations. The proposed modification does not require a physical change in the mixing or curing equipment and will not result in a change in throughput. However, the new binder material has a higher VOC emission rate and requires a minor limit for the project to remain under the PSD significant level.

The notice also stated that the OAQ proposed to issue a significant permit modification and significant source modification for this source and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

The following is a list of individuals who provided comments on the above referenced permits. The comments were received by telephone and email:

<u>Name</u>	<u>Date Received</u>
Dan Stockman	August 7, 2008
Judi Cook	August 10, 2008
Laurie Szajna	August 11, 2008
Dorothy Saxton	August 12, 2008
Richard Saxton	August 12, 2008
Ladonna Yoder	August 12, 2008
Lynda Place	August 12, 2008
Carolyn Capone	August 13, 2008
Diane Schaper	August 17, 2008

Collectively, their comments have been grouped and summarized below:

Comment 1:

BF Goodrich was caught burning tires after dark by one of its neighbors using an infrared camera. When they burn the tires, a black film is deposited on our lawns, houses, and everything else left outside. IDEM was contacted with a complaint and an inspector came out. After reporting the burning, the black film subsided. We do not want any more pollution from this plant. IDEM should consider what is best for everyone, not just the profits of the company.

Response to Comment 1:

This comment is not directly related to the modification proposed at B.F. Goodrich Tire Manufacturing. The electronic database of complaints maintained by IDEM, the facility inspector and the compliance history maintained by the U.S. EPA was checked to verify the violation history of this source. Currently, there are no open complaints or pending enforcement actions against B.F. Goodrich Tire Manufacturing related to this complaint. If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

However, IDEM encourages citizens who have a concern about a source of pollution to file a complaint. IDEM has a Complaint Clearinghouse that is the central point for receiving and coordinating complaints within IDEM and with other local, state, and federal agencies. The Complaint Clearinghouse staff also establishes agency standards for responding to and tracking complaints to measure agency responsiveness and identify trends or issues as they relate to complaints. You can file a complaint with IDEM three different ways:

1. [Submit a complaint on-line](http://www.in.gov/idem/5275.htm) at <http://www.in.gov/idem/5275.htm> on the internet,
2. Call the Complaint Coordinator at (800) 451-6027 ext.24464, or
3. Print, complete, and mail a paper-based [Complaint Submission Form \[PDF\]](http://www.in.gov/icpr/webfile/formsdiv/50014.pdf). This form is found at <http://www.in.gov/icpr/webfile/formsdiv/50014.pdf> on the internet.

Spills and other environmental emergencies should be immediately reported to IDEM at (888) 233-7745.

No changes to the draft permit are proposed as a result of this modification.

Comment 2:

How will the use of silane binder in the tire process effect workers on a twelve hour shift. How much exposure to silane does a worker have to endure without hurting our health?

Response to Comment 2:

The Indiana Department of Environmental Management does not regulate worker health and safety. For concerns about occupational safety and health, please contact the Indiana Department of Safety and Health Administration (IOSHA) information line at 317-232-2655. To file a formal complaint, please put your complaint in writing and include your name, address, and telephone number (this information is kept confidential). Sign the complaint, and fax it to the Complaint Duty Officer at 317-234-4428 or mail it to:

Indiana Department of Labor - IODHA
Attn: Complaint Duty Officer
402 West Washington Street
Room W195
Indianapolis, Indiana 46204

You may also speak to the Complaint Duty Officer at 317-232-2693.

No changes to the draft permit are proposed as a result of this modification.

Comment 3:

The air quality in the Fort Wayne area has declined over the last 5 to 6 years. In fact, Fort Wayne is at the bottom of the list nationally in air quality and the American Lung Association just gave the area a D in air quality, up from an F. Are emissions from this project and others like it, responsible for the poor air quality in the Fort Wayne area? We want jobs in our community but not at the cost of our health.

Response to Comment 3:

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO₂), particulate matter to a diameter of 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x) and ground level ozone. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor

air. The NAAQS limit for each criteria pollutant is set low enough to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated. Currently, Allen County is in attainment for all National Ambient Air Quality Standards (NAAQS) and, in addition, the comment itself suggests an improving trend in air quality.

The air pollution control permit for BF Goodrich requires the construction and operation of all equipment at the facility to comply with state and federal air quality rules and regulations. The NAAQS, as described above, are put in place to protect everyone, including those persons living closest to a source of air pollution. If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

No changes to the draft permit are proposed as a result of this modification.

Comment 4:

I have noticed trees in our area are not as "fresh" or leafed out and green. They are full of dead branches. Is this related to this project and others in the area?

Response to Comment 4:

The U.S. EPA Secondary National Ambient Air Quality Standards are standards established to protect non-health related effects of air pollution. These standards are designed to protect property, crops, and domestic animals. Currently, Allen County is in attainment for all National Ambient Air Quality Standards.

No changes to the draft permit are proposed as a result of this modification.

Comment 5:

I am a school teacher and I have notice the children have trouble breathing on certain days. Is this related to the project and others in Fort Wayne?

Response to Comment 5:

The National Ambient Air Quality Standards (NAAQS) referenced in the Response to Comment 3 is set low enough to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly. Allen County is in attainment for all of the National Ambient Air Quality Standards. The emissions from this modification are below the levels considered significant by 326 Indiana Administrative Code (IAC) 2-2, Prevention of Significant Deterioration and will not cause significant deterioration to the air quality in the surrounding area. If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

IDEM maintains a web site to alert the public of days when the ground level ozone levels may require the curtailment of outdoor activities. This web site may be accessed at www.in.gov/apps/idem/smog/. When the eight hour ozone breakpoint level is between 85 ppb and 105 ppb or the one hour ozone level is between 125 ppb and 164 ppb, a health scale reading of unhealthy for sensitive groups is reached. When the air quality forecast indicates a health scale reading of unhealthy for sensitive groups, it is recommended that people with heart or lung disease, older adults, and children should reduce prolonged or heavy exertion.

No changes to the draft permit are proposed as a result of this modification.

Comment 6:

BF Goodrich has requested an increase in the ozone causing pollution by up to 40 tons per year. As a new resident in Woodburn, Indiana, I do not want to see the use of any manufacturing materials or processes which will increase pollution in my town or anywhere else in Indiana. Indiana and the United States must be a leader in reducing ozone causing pollutants. Indiana recently made a bad name for

itself when it allowed a steel mill in northwest Indiana to increase its level of pollution into the air. Please do not do so again. I can not imagine that IDEM would approve any requests which will increase pollution in our state. I hope I can count on IDEM to vote against any new practices causing more pollution and ozone problems. I believe a public hearing is necessary to allow the citizens of northeast Indiana to comment.

Response to Comment 6:

The Indiana Department of Environmental Management has a responsibility to ensure all modifications to Part 70 Operating Permits follow state and federal regulations. The emissions from this modification are below the levels considered significant by 326 IAC 2-2, Prevention of Significant Deterioration and will not cause significant deterioration of the air quality in the surrounding area. Currently, Allen County is in attainment for all National Ambient Air Quality Standards (NAAQS). If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

No changes to the draft permit are proposed as a result of this modification.

Comment 7:

The stack emits a dark smoke from time to time, usually at dusk. The problem was reported to IDEM and the plant when it occurred. The company says it was due to cleaning a dust collector.

Response to Comment 7:

This comment is not directly related to the modification proposed at B.F. Goodrich Tire Manufacturing. The electronic database of complaints maintained by IDEM, the facility inspector and the compliance history maintained by the U.S. EPA was checked to verify the violation history of this source. Currently, there are no open complaints or pending enforcement actions against B.F. Goodrich Tire Manufacturing related to this complaint. If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

However, IDEM encourages citizens who have a concern about a source of pollution to file a complaint. IDEM has a Complaint Clearinghouse that is the central point for receiving and coordinating complaints within IDEM and with other local, state, and federal agencies. The Complaint Clearinghouse staff also establishes agency standards for responding to and tracking complaints to measure agency responsiveness and identify trends or issues as they relate to complaints. You can file a complaint with IDEM three different ways:

1. [Submit a complaint on-line](http://www.in.gov/idem/5275.htm) at <http://www.in.gov/idem/5275.htm> on the internet,
2. Call the Complaint Coordinator at (800) 451-6027 ext.24464, or
3. Print, complete, and mail a paper-based [Complaint Submission Form \[PDF\]](http://www.in.gov/icpr/webfile/formsdiv/50014.pdf). This form is found at <http://www.in.gov/icpr/webfile/formsdiv/50014.pdf> on the internet.

Spills and other environmental emergencies should be immediately reported to IDEM at (888) 233-7745.

No changes to the draft permit are proposed as a result of this modification.

Comment 8:

Will this project make my allergies or asthma worse? We have an excessive amount of cancer and lung disease Woodburn, will this project cause more?

Response to Comment 8:

The National Ambient Air Quality Standards (NAAQS) referenced in the Response to Comment 3 are set low enough to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly. Allen County is in attainment for all National Ambient Air Quality Standards. The emissions from this modification are below the levels considered significant by 326 Indiana Administrative Code (IAC) 2-2, Prevention of Significant Deterioration and will not cause significant

deterioration to the air quality in the surrounding area.

Many Hazardous Air Pollutants (HAPs) are probable or known carcinogens. However, this project does not allow any increase in Hazardous Air Pollutant emissions.

No changes to the draft permit are proposed as a result of this modification.

Comment 9:

Why can't the source use a lower VOC or less hazardous material in place of silane?

Response to Comment 9:

The Indiana Department of Environmental Management regulates the emissions of criteria pollutants from this source in tons per year. The specific emissions units and raw materials used at BF Goodrich are operational and business decisions of the company. IDEM will restrict the VOC emissions from this modification to less than forty (40) tons per year. If an applicant demonstrates that they will be able to comply with all federal and state laws regarding air pollution, IDEM is required by law to issue their air permit.

No changes to the draft permit are proposed as a result of this modification.

Comment 10:

This plant emits odors at night and I want it to stop.

Response to Comment 10:

IDEM has no authority to regulate odor. Unusual odors or changes in odors may be an indication that a process is not running correctly and may require corrective action at the facility.

IDEM encourages citizens who have a concern about a source of pollution to file a complaint. IDEM has a Complaint Clearinghouse that is the central point for receiving and coordinating complaints within IDEM and with other local, state, and federal agencies. The Complaint Clearinghouse staff also establishes agency standards for responding to and tracking complaints to measure agency responsiveness and identify trends or issues as they relate to complaints. You can file a complaint with IDEM three different ways:

4. [Submit a complaint on-line](http://www.in.gov/idem/5275.htm) at <http://www.in.gov/idem/5275.htm> on the internet,
5. Call the Complaint Coordinator at (800) 451-6027 ext.24464, or
6. Print, complete, and mail a paper-based [Complaint Submission Form \[PDF\]](http://www.in.gov/icpr/webfile/formsdiv/50014.pdf). This form is found at <http://www.in.gov/icpr/webfile/formsdiv/50014.pdf> on the internet.

Spills and other environmental emergencies should be immediately reported to IDEM at (888) 233-7745.

No changes to the draft permit are proposed as a result of this modification.

Additional Changes:

IDEM, OAQ has decided to make additional revisions to the permit. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes and will not be updated, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**. The proposed changes follow:

Change #1

To eliminate a rounding error, IDEM revised the throughput of silane to 467,800 tons per twelve consecutive month period. The reduction in the throughput of silane will result in the reduction of VOC emissions. The intent of the current throughput limit was to restrict VOC emissions due to the modification to less than 40 tons per twelve consecutive month period. However, the VOC emissions are

in excess of 40 tons when expressed to three decimal places, 40.001. The revised throughput limit still restricts emissions to less than 40 tons (39.997 tons) per twelve consecutive month period. The emission calculations have been updated and attached to this ATSD. Condition D.1.1 and the reporting form have been revised to show the revised silane usage limit as shown below:

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the Banbury mixing area or the tire curing process, the Permittee shall:

- 1) limit the input of silane binder, degussa X 50-S or equivalent, to the Banbury mixing area and tire curing process to less than ~~467,850~~ **467,800** lb per twelve consecutive month period with compliance determined at the end of each month; and
- 2) ethanol emissions shall not exceed 0.171 pounds of ethanol per pound of silane input to the Banbury mixing area and tire curing process.

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

Part 70 Annual Report

Source Name: BF Goodrich Tire Manufacturing
 Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
 Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
 Part 70 Permit No.: T003-20341-00008
 Facility: Banbury Mixing Area and Tire Curing Process
 Parameter: Silane Binder Input
 Limit: Less than ~~467,850~~ **467,800** lb per twelve (12) consecutive month period, with compliance determined at the end of each month.

Change #2

On page 3 of 10 of the TSD, the table for the PTE Change of the Modified Process is incorrect. Revisions to the table are shown below:

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Net Difference (ton/yr)
PM	5.24	5.24	0.00
PM ₁₀	5.24	5.24	0.00
SO ₂	0.00	0.00	0.00
VOC	114.04	≥ <154.04	≥ < 40.00
CO	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
HAPs	0.00	0.00	0.00

IDEM, OAQ acknowledges that the PTE After Modification and Net Difference are shown incorrectly in the TSD. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Change #3

This significant permit modification was drafted with the understanding that the renewal application T003-20341-00008 would be issued first and any revisions would be incorporated into this Addendum to the Technical Support Document (ATSD). T003-20341-00008 was issued on September 3, 2008. Condition D.3.2 has been revised to reflect the response to comment #2 and comment #4 in the ATSD for Part 70 Operating Permit Renewal T003-20341-00008:

D.3.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, particulate emissions from the tread end cementing operations shall not exceed ~~27.47~~ **27.1** pounds per hour when operating at a process weight of 33,646 pounds per hour.

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:

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

- (b) **Pursuant to 326 IAC 6-3-2, particulate emissions from the protectant spray operation shall be controlled by particulate baffle filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**
- (bc) Pursuant to 326 IAC 6-3-2(d), particulate emissions from each of the green tire spraying booths shall be controlled by particulate baffle filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Change #4

Section A.3, the facility description boxes in Sections D.3, D.4, E.1 and E.2 and Condition E.1.2 have been revised to reflect the response to comment #4 in the ATSD for T003-20341-00008. This comment adds a specifically regulated insignificant activity as described below. In addition, a typographical error was discovered, after the EPA proposed period, in the facility description boxes of Sections D.3 and E.2. The typographical error is in the emission unit description for the green tire spray operation. These facility description boxes show the maximum throughput capacity of the green tire spray operation as 47,920 pounds per hour. The actual capacity is 47,290 pounds per hour, as described in Section A.3 shown below. The throughput of the green tire spray operation has been revised to match the description in Section A.3(b). These revisions are shown below:

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

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) One (1) green tire spray operation, with a maximum capacity of 47,290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (c) **One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.**
- (ed) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 2-6; [326 IAC 8-3-2]

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:
...

Insignificant Activities:

- (b) One (1) green tire spray operation, with a maximum capacity of 47,920~~290~~ pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.
- (c) **One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.**

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

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

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

...

Insignificant Activities:

...

- (c) **One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.**

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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Rubber Tire Manufacturing [40 CFR Part 63, Subpart XXXX]

Pursuant to 40 CFR Part 63, Subpart XXXX, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart XXXX for the affected facility described below, as specified as follows on and after July 11, 2005.

...

- (7) **One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.**

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

...

Insignificant Activities:

(b) One (1) green tire spray operation, with a maximum capacity of 47,920290 pounds per hour, using particulate baffle filters, exhausting at stacks 262, 263, 264, and 280. This unit is an affected unit under 40 CFR 63, Subpart XXXX and 40 CFR 60, Subpart BBB.

(c) **One (1) protectant spray operation, with a maximum throughput capacity of 41,497 pounds of tires per hour, exhausting to stacks 259 and 265. This unit is an affected unit under 40 CFR 60, Subpart BBB and 40 CFR 63, Subpart XXXX.**

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

Change #5

After the EPA proposed period, a typographical error was discovered and revised in Condition C.20(a). Condition C.20(a) incorrectly describes the reporting time frame for the Deviation and Compliance Monitoring Report. The time frame is quarterly and not semi-annually. The reporting form provided in the permit correctly states the time frame as quarterly. Condition C.20(a) has been revised as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2][326 IAC 2-3]

- (a) The Permittee shall submit the attached ~~Semi-Annual~~ **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 ~~Semi-Annual~~ **Quarterly** Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Process Emissions - Silane Project VOC Emissions

Appendix A : Emissions Calculations
Company Name : BF Goodrich Tire Manufacturing
Address : 18906 US Highway 24 East, Woodburn, Indiana 46797
Permit Modification Number : SSM 003-26320-00008 and SPM 003-26647-00008
Part 70 Operating Permit Number : T003-20341-00008
Reviewer : David J. Matousek
Date : June 17, 2008

VOC Emissions with Silane Binder							
Process Unit ID	Process Description	Throughput	Throughput Units	Emission Factor	Emission Factor Units	Emissions (lb/hr)	Emissions (ton/yr)
02	Banbury Mixing / Tire Curing	467,800	lb silane / yr	0.171	lb ethanol / lb Silane	9.13	39.997
Total						9.13	39.997

Methodology:

- 1) Emissions (lb/hr) = throughput (lb silane/yr) x emission factor (lb ethanol / lb silane) / 8,760 hr/yr.
- 2) Emissions (ton/yr) = throughput (lb silane/yr) x emission factor (lb ethanol / lb silane) / 2,000 lb/ton
- 3) Emission Factors were provided by the applicant. The emission factors are specific to the emission units and tire compounds in use at this source. Detailed emission calculations were provided by the applicant under a claim of confidentiality. IDEM, OAQ has reviewed the emission calculations and believes them to be accurate.
- 4) The source will be limited to less than 467,800 lb silane / yr to ensure potential VOC emissions from this modification remain less than 40 tons per year, making the requirements of 326 IAC 2-2 (PSD) not applicable.
- 5) The source used testing at a similar facility to document the VOC emissions from the mixing and curing operations.
- 6) The source estimated VOC emissions due to the use of silane binder in the mixing operation at 0.122 lb ethanol emitted per lb of rubber mixed. This assumes 100% flash off of the ethanol produced.
- 7) The VOC emissions from the curing operation at 0.049 lb ethanol per lb of rubber cured. This assumes 100% flash off of the ethanol produced.
- 8) All VOC emissions related to the use of silane are ethanol. The VOC emissions shown above reflect the increase in VOC emissions due to the use of silane and not the total VOC emissions due to mixing and curing.

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

**Technical Support Document (TSD) for a Part 70
Significant Permit and Significant Source Modification**

Source Description and Location

Source Name:	BF Goodrich Tire Manufacturing, Inc.
Source Location:	18906 Highway 24 East Woodburn, Indiana 46797
County:	Allen County
SIC Code:	3011
Operation Permit No.:	T 003-20341-00008
Operation Permit Issuance Date:	Anticipated in July 2008
Significant Permit Modification No.:	003-26647-00008
Significant Source Modification No.:	003-26320-00008
Permit Reviewer:	David J. Matousek

Existing Approvals

The source was issued Part 70 Operating Permit No. T 003-5974-00008 on October 16, 2000 and the source submitted a timely Part 70 Operating Permit Renewal application on January 12, 2005. Renewal application T003-20341-00008 is pending and is anticipated to be issued in July of 2008. Significant Permit Modification No. 003-26647-00008 will use the pending renewal as the base permit. Any changes in the draft or proposed Part 70 Operating Permit Renewal will be incorporated into this Significant Permit Modification (003-26647-00008) and Significant Source Modification (003-26320-00008) with an Addendum to the Technical Support Document (ATSD).

County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, 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.
¹ Unclassifiable 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 PM _{2.5} .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Allen County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) **Other Criteria Pollutants**
Allen 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.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward the determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (ton/yr)
PM	29.6
PM ₁₀	29.6
SO ₂	248.6
VOC	140.2
CO	13.7
NO _x	59.7
HAP	Not Reported
Total HAPs	Not Reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by BF Goodrich Tire Manufacturing on March 27, 2008, relating to a change in raw materials used in the Banbury mixing operation and the tire curing operation. BF Goodrich Tire Manufacturing applied to allow the use of silica and silane binder in the mixing and curing operations. The proposed modification does not require a physical change in the mixing or curing equipment and will not result in a change in throughput. However, the new binder material has a higher VOC emission rate and requires a minor limit for the project to remain under the PSD significant level.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations. This source submitted emission calculations for the entire facility under a confidentiality claim. IDEM has reviewed the emission calculations and believes they are accurate and correct.

Permit Level Determination – Part 70

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

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

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Net Difference (ton/yr)
PM	5.24	5.24	0.00
PM ₁₀	5.24	5.24	0.00
SO ₂	0.00	0.00	0.00
VOC	114.04	> 154.04	> 40.00
CO	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
HAPs	0.00	0.00	0.00

This source modification is subject to 326 IAC 2-7-10.5(f)(4), because the potential to emit VOC of this modification is greater than twenty-five (25) tons per year.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification does not qualify as an administrative amendment or minor permit modification due to a determination of a case-by-case emission limitation.

Permit Level Determination – PSD or Emission Offset

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

Process / Emission Unit	Potential to Emit (ton/yr)					
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
Banbury Mixing / Tire Curing	0.00	0.00	0.00	< 40.00	0.00	0.00
Total for Modification	0.00	0.00	0.00	< 40.00	0.00	0.00
Significant Level	25.00	15.00	40.00	40.00	100.00	40.00

This modification to an existing major stationary source is not major because the VOC emission increase is less than the PSD significant level. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This source submitted an application for a significant permit modification (003-24944-00008) and a significant source modification (003-24784-00008) on May 16, 2007. This application requested the construction and operation of twenty-six (26) curing presses and the replacement of seven (7) existing tire uniformity optimizer (TUO) units. These emission units were relocated to this facility from another BF Goodrich plant recently closed in Canada.

In the current project, the source wishes to use a new binder material to allow the construction of a new line of tires. To ensure this project will be considered separate from the last curing press project, the source has requested an enforceable permit condition to prevent the use of the new silane binder on the twenty-six curing presses added under SSM 003-24784-00008 and SPM 003-24944-00008, identified as F01 to F20 and J11 to J16. IDEM, OAQ has reviewed both projects and has determined they are unrelated.

In addition, a usage limit was accepted to keep the project minor for PSD. The proposed limits follow:

PSD Minor Limits

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year, the source has elected to limit the potential to emit of this modification as follows:

- (a) The Permittee shall limit the input of silane binder to the Banbury mixing and tire curing operation to less than 467,850 lb per twelve consecutive month period with compliance determined at the end of each month and the amount of ethanol emitted shall not exceed 0.171 pounds of ethanol per pound of silane input to the Banbury mixing and tire curing operation.
- (b) Silane binder shall not be used on any curing press approved for construction under significant source modification No. 003-24784-00008 and operation under significant permit modification No. 003-24944-00008. Specifically, silane binder shall not be used in curing presses F01 to F20 and J11 to J16.

Compliance with these limits will render the requirements of 326 IAC 2-2 (PSD) not applicable to this modification.

Federal Rule Applicability Determination

There are no new federal regulations applicable due to this project.

State Rule Applicability Determination

There are no new state rules applicable to the source due to this project. The following are presented for clarity purposes:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

The potential VOC emissions from this modification are less than the PSD significant level; therefore, the requirements of 326 IAC 2-2 (PSD) do not apply to this modification.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing (40 CFR 63, Subpart XXXX); therefore, the existing source is exempt from the requirements of 326 IAC 2-4.1-1.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Banbury mixing operation shall not exceed 33.98 pounds per hour when operating at a process weight rate of 46,974 pounds per hour. The pound per hour limitation was calculated with the following equation:

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

The throughput of the Banbury mixing operation has not changed as a result of this project. Therefore, the 326 IAC 6-3-2 emission limit remains the same. The tire curing operation is not subject to 326 IAC 6-3-2 because it does not produce particulate matter emissions.

326 IAC 8-1-6 (Best Available Control Technology)

The potential to emit VOC from the tire curing operation, including this project, is 81.26 tons per year in 204 curing presses. The potential to emit VOC from each curing press is approximately 0.40 tons VOC per year. The potential to emit VOC from the banbury mixing operation, including this project, is 72.78 tons per year in three mixers. The potential to emit VOC from each facility is 24.26 tons per year. Because the potential to emit VOC from each facility is less than twenty-five tons per year, the requirements of 326 IAC 8-1-6 do not apply to the Banbury mixing operation or the tire curing operation.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

There are no new Compliance Determination or Compliance Monitoring Requirements applicable to this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T003-20341-00008. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change #1

Original Condition B.18 - Permit Amendment or Modification has been revised to update the rule citations. The revised condition follows:

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

...

Change #2

Original Condition C.5 - Fugitive Dust Emissions has been revised to indicate the condition is not federally enforceable. The revised condition follows;

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). **326 IAC 6-4-2(4) is not federally enforceable.**

Change #3

Original Condition C.6 - Stack Height has been revised to indicate the portions of the rule that are not federally enforceable. The revised condition follows:

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. **The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.**

Change #4

Original Condition C.11 - Maintenance of Continuous Emission Monitoring Equipment has been revised to cite the justification for the requirement to use a CEM. The revised condition follows:

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to **significant source modification number 003-20073-00008.**

Change #5

The clean unit and pollution control project provisions of the U.S. EPA's New Source Review Reform Rules were vacated on June 24, 2005 by a United States Court of Appeals for the District of Columbia Circuit decision. The OAQ plans to remove the vacated provisions from 326 IAC 2 at the next state rulemaking opportunity. This decision also remanded the "reasonable possibility" standard back to U.S. EPA. On January 22, 2008, U.S. EPA promulgated a rule to address the remand, by the U.S. Court of Appeals for the District of Columbia on June 25, 2005, of the reasonable possibility provisions of the December 31, 2002 major NSR reform rule. IDEM has agreed, with U.S. EPA, to interpret

"reasonable possibility" in 326 IAC 2-2 and 326 IAC 2-3 consistent with the January 22, 2008 U.S. EPA rule. To implement this interpretation, IDEM is revising Section C - General Record Keeping Requirements and Section C - General Reporting Requirements (original Conditions C.19 and C.20). Revisions are shown below:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

...

- (c) If there is a **reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b))** that a "project" (as defined in 326 IAC 2-2-1(qq) **and/or 326 IAC 2-3-1(II)**) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) **and/or 326 IAC 2-3-1(z)**) **may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions"** (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

...

- (d) **If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a))** that a "project" (as defined in 326 IAC 2-2-1(qq) **and/or 326 IAC 2-3-1(II)**) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) **and/or 326 IAC 2-3-1(z)**) **may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions"** (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), **the Permittee shall comply with following:**

- (21) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (22) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

...

- (f) If the Permittee is required to comply with the recordkeeping provisions of (ed) 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 (II)) 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 (de)(12) and (23) 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

...

Change #6

The source has elected to take a usage limit on silane binder in order to maintain the potential increase in VOC emissions to less than 40 tons per year. In addition, the source has elected to restrict the number of curing presses capable of using the silane binder. Both of these conditions are required to ensure the requirements of 326 IAC 2-2 (PSD) do not apply to this modification. Condition D.1.1 - PSD Minor Limit has been added to the permit and the remaining conditions have been renumbered. In addition, original condition D.3.1 has been revised to include PSD minor limits relating to the use of silane binder. The proposed revisions follow:

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the Banbury mixing area or the tire curing process, the Permittee shall:

- 1) limit the input of silane binder, degussa X 50-S or equivalent, to the Banbury mixing area and tire curing process to less than 467,850 lb per twelve consecutive month period with compliance determined at the end of each month; and**
- 2) ethanol emissions shall not exceed 0.171 pounds of ethanol per pound of silane input to the Banbury mixing area and tire curing process.**

D.3.1 ~~Prevention of Significant Deterioration (PSD)~~ PSD Minor Limits [326 IAC 2-2]

- (a) VOC emissions from the twenty-six (26) curing presses installed under SPM 003-24944-00008 and SSM 003-24784-00008 shall not exceed 0.67 lb VOC per ton rubber cured.
- (b) Total rubber cured in the twenty-six (26) curing presses installed under SPM 003-24944-00008 and SSM 003-24784-00008 shall not exceed 25,575 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) VOC emissions from the Tread End Cementers shall be directed to either one of the four (4) process boilers for destruction in order to achieve a reduction in the VOC emissions by 2 tons per twelve (12) month period.
- (d) Silane binder shall not be used on any curing press approved for construction under significant source modification No. 003-24784-00008 and operation under significant permit modification No. 003-24944-00008. Specifically, silane binder shall not be used in curing presses F01 to F20 and J11 to J16.**

Compliance with this condition shall render the requirements of 326 IAC 2-2, Prevention of Significant Deterioration not applicable to SSM 003-20073-00008 and SPM 003-21271-00008, ~~as well as SSM 003-24784-00008 and SPM 003-24944-00008,~~ **as well as SSM 003-26320-00008 and SPM 003-26647-00008**, respectively.

Change #7

References to original condition D.1.1 - Particulate Emission Limitations [326 IAC 6-3-2] in section D.1 of the permit have been updated as a result of the addition of a PSD minor limit in section D.1. The conditions affected by this change follow:

D.1.34 Particulate Control

- (a) In order to comply with condition D.1.42, the dust collectors, baghouses, and centrifugal separators for particulate control shall be in operation and control emissions from the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area at all times that the facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.78 Record Keeping Requirement

- (a) To document compliance with Condition D.1.45(a), (b), and (c), the Permittee shall maintain records of daily visible emission notations of the stack exhaust from 197, 200, 208, 210, 258 to 261, 265 to 277, and 356A to 356D. The Permittee shall include in its daily record when a visible emission reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.56, the Permittee shall maintain the daily automatic or manual readings of the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses differential pressure. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of these readings (e.g. the process did not operate that day).
- (c) **To document compliance with Condition D.1.1, the Permittee shall maintain records of the input of silane binder to the tire curing process and Banbury mixing area. Records shall include inventory usage records, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of binder used.**
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change #8

Condition D.1.9 - Reporting Requirements has been added to the permit to require the source to report compliance with condition D.1.1 and D.1.8(c). Condition D.1.8 follows:

D.1.9 Reporting Requirement

An annual summary of the information used to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the year being reported.

Change #9

An annual reporting form has been added to the permit to allow the source to report the input of silane binder to the source. Portions of the reporting form are shown below:

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

Part 70 Annual Report

Source Name: BF Goodrich Tire Manufacturing
Source Address: 18906 Highway 24 East, Woodburn, Indiana 46797
Mailing Address: P.O. Box 277, Woodburn, Indiana 46797-0277
Part 70 Permit No.: T003-20341-00008
Facility: Banbury Mixing Area and Tire Curing Process
Parameter: Silane Binder Input
Limit: Less than 467,850 lb per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Reporting Period	Column 1	Column 2	Column 1 + Column 2
	Silane Input This Month	Silane Input Previous 11 Months	Silane Input 12 Month Total
Month 1			
...
Month 12			

...

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit and Source Modification. The staff recommends to the Commissioner that this Part 70 Significant Permit and Source Modification be approved.

Process Emissions - Silane Project VOC Emissions

Appendix A : Emissions Calculations

Company Name : BF Goodrich Tire Manufacturing

Address : 18906 US Highway 24 East, Woodburn, Indiana 46797

Permit Modification Number : SSM 003-26320-00008 and SPM 003-26647-00008

Part 70 Operating Permit Number : T003-20341-00008

Reviewer : David J. Matousek

Date : June 17, 2008

VOC Emissions with Silane Binder							
Process Unit ID	Process Description	Throughput	Throughput Units	Emission Factor	Emission Factor Units	Emissions (lb/hr)	Emissions (ton/yr)
02	Banbury Mixing / Tire Curing	467,850	lb silane / yr	0.171	lb ethanol / lb Silane	9.13	40.00
Total						9.13	40.00

Methodology:

- 1) Emissions (lb/hr) = throughput (lb silane/yr) x emission factor (lb ethanol / lb silane) / 8,760 hr/yr.
- 2) Emissions (ton/yr) = throughput (lb silane/yr) x emission factor (lb ethanol / lb silane) / 2,000 lb/ton
- 3) Emission Factors were provided by the applicant. The emission factors are specific to the emission units and tire compounds in use at this source. Detailed emission calculations were provided by the applicant under a claim of confidentiality. IDEM, OAQ has reviewed the emission calculations and believes them to be accurate.
- 4) The source will be limited to less than 467,850 lb silane / yr to ensure potential VOC emissions from this modification remain less than 40 tons per year, making the requirements of 326 IAC 2-2 (PSD) not applicable.
- 5) The source used testing at a similar facility to document the VOC emissions from the mixing and curing operations.
- 6) The source estimated VOC emissions due to the use of silane binder in the mixing operation at 0.122 lb ethanol emitted per lb of rubber mixed. This assumes 100% flash off of the ethanol produced.
- 7) The VOC emissions from the curing operation at 0.049 lb ethanol per lb of rubber cured. This assumes 100% flash off of the ethanol produced.
- 8) All VOC emissions related to the use of silane are ethanol. The VOC emissions shown above reflect the increase in VOC emissions due to the use of silane and not the total VOC emissions due to mixing and curing.