



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: March 19, 2009

RE: CBA/Tredoc Tire Service / 089-27363-00541

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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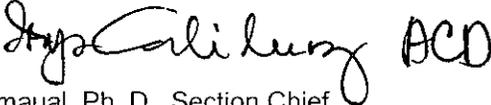
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Indianapolis, Indiana 46204
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REGISTRATION OFFICE OF AIR QUALITY

**CBA/Tredroc Tire Service
149 S. Colfax
Griffith, Indiana 46319**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 089-27363-00541	
Issued by:  ACD	Issuance Date: March 19, 2009
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary tire retreading facility.

Source Address:	149 S. Colfax, Griffith, Indiana 46319
Mailing Address:	2450 Lunt Ave., Elk Grove Village, Illinois 60007
General Source Phone Number:	(219) 922-2200
SIC Code:	7534
County Location:	Lake County
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) automated tire buffing machine, identified as TB-1, constructed in 1996, with a maximum capacity of 10 tires per hour, using a wall filter for particulate control, and exhausting within the building.
- (b) One (1) manual tire buffing machine, identified as TB-2, constructed in 1996, with a maximum capacity of 10 tires per hour, using a wall filter for particulate control, and exhausting within the building.
- (c) One (1) cushion/cured tread extruder, identified as EXT-1, constructed in 1996, with a maximum capacity of 10 tires per hour and 22 pounds of rubber per tire, utilizing no control, and exhausting within the building.
- (d) Two (2) repair areas, identified as REP-1 and REP-2, constructed in 1996, each with a maximum capacity of 10 tires per hour each, utilizing no control, and exhausting within the building.
- (e) Eight (8) curing chambers, identified as CUR-1 through CUR-8, constructed in 1996, each with a maximum capacity of 132 tires per day, utilizing no control, and exhausting within the building.
- (f) One (1) automated spray applicator, identified as SB-1, constructed in 1996, with a maximum capacity of 20 tires per hour and 1.5 gallons of paint per day, and exhausting within the building.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 089-27363-00541 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	CBA/Tredroc Tire Service
Address:	149 S. Colfax Ave.
City:	Griffith, Indiana 46319
Phone Number:	(219) 922-2200
Registration No.:	089-27363-00541

I hereby certify that CBA/Tredroc Tire Service is :

- still in operation.
- no longer in operation.

I hereby certify that CBA/Tredroc Tire Service is :

- in compliance with the requirements of Registration No. 089-27363-00541.
- not in compliance with the requirements of Registration No. 089-27363-00541.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name: CBA/Tredroc Tire Service
Source Location: 149 South Colfax Avenue, Griffith, IN 46319
County: Lake
SIC Code: 7534
Operation Permit No.: 089-27363-00541
Permit Reviewer: Anne-Marie C. Hart

On December 10, 2008, the Office of Air Quality (OAQ) received an application from CBA/Tredroc Tire Service related to the operation of an existing tire retreading facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.
Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (i) 1-hour ozone standard
On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South*

Coast decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

- (ii) 8-hour ozone standard
VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) PM2.5
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants
Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by CBA/Tredroc Tire Service on December 10, 2008, relating to the operation of a tire retreading facility.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) automated tire buffing machine, identified as TB-1, constructed in 1996, with a maximum capacity of 10 tires per hour, using a wall filter for particulate control, and exhausting within the building.
- (b) One (1) manual tire buffing machine, identified as TB-2, constructed in 1996, with a maximum capacity of 10 tires per hour, using a wall filter for particulate control, and exhausting within the building.
- (c) One (1) cushion/cured tread extruder, identified as EXT-1, constructed in 1996, with a maximum capacity of 10 tires per hour and 22 pounds of rubber per tire, utilizing no control, and exhausting within the building.
- (d) Two (2) repair areas, identified as REP-1 and REP-2, constructed in 1996, each with a maximum capacity of 10 tires per hour each, utilizing no control, and exhausting within the building.
- (e) Eight (8) curing chambers, identified as CUR-1 through CUR-8, constructed in 1996, each with a maximum capacity of 132 tires per day, utilizing no control, and exhausting within the building.
- (f) One (1) automated spray applicator, identified as SB-1, constructed in 1996, with a maximum capacity of 20 tires per hour and 1.5 gallons of paint per day, and exhausting within the building.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination –Registration

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Tire Buffing	Negl.	Negl.	Negl.	0.00	0.00	0.00	0.00	0.00	0.00
Tire Repair	0.00	0.00	0.00	0.00	0.00	5.45	0.00	1.67	1.67 (Trichloroethylene)
Extruders	Negl.	Negl.	Negl.	0.00	0.00	0.01	0.00	0.03	0.01 Methylene Chloride
Curing	0.00	0.00	0.00	0.00	0.00	11.05	0.00	6.55	5.77 Carbon Disulfide

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	Negl.	Negl.	Negl.	0.00	0.00	16.51	0.00	8.25	5.77 Methylene Chloride
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for the Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB (326 IAC 12), are not included in the permit, since this source retreads tires and does not manufacture tires.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of 40 CFR 63, Subpart XXXX, NESHAP for Rubber Tire Manufacturing (40 CFR Part 63.5980 - 63.6015) (326 IAC 20-55), are not included in this permit, since this source is not a major source of HAPs, as defined in 40 CFR 63.2.
- (d) The requirements of 40 CFR 63, Subpart HHHHHH, NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63.11169 - 63.11180), are not included in this permit, since this area source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coatings that contain chromium, lead manganese, nickel or cadmium to a plastic and/or metal substrates.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in Lake County, it has potential to emit of NO_x and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
The source, located in Lake County, does not have the potential to emit five (5) tons per year of fugitive particulate matter. Therefore, the source is not subject to 326 IAC 6.8-10.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Tire Retreading Operation

- (h) 326 IAC 6.8 (Particulate Matter Limitations for Lake County)
The tire retreading operation has potential particulate matter emissions less than 100 tons and actual particulate matter emissions less than 10 tons per year. Therefore, the tire retreading operation is not subject to the provisions of 326 IAC 6.8-1-2.
- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processing)
The tire retreading operation has potential particulate emissions less than 0.551 pound per hour. Therefore, the tire retreading operation is exempt from 326 IAC 6-3-2.
- (j) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
The source does not manufacture pneumatic rubber, passenger type tires on a mass production basis. Therefore the tire retreading operation is not subject to the provisions of 326 IAC 8-5-4.

Conclusion and Recommendation

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

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 089-27363-00541. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Anne-Marie C. Hart at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

SUMMARY OF EMISSIONS

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Plt ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Uncontrolled Emissions (Tons/Yr)					
Pollutant	Tire Buffing	Tire Repair	Extruders	Curing	Total PTE
PM	8.60E-04	0.00	7.49E-06	0.00	8.67E-04
PM10	8.60E-04	0.00	7.49E-06	0.00	8.67E-04
PM2.5	8.60E-04	0.00	7.49E-06	0.00	8.67E-04
VOC	0.00	5.45	0.01	11.05	16.51
NOx	0.00	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00	0.00
Single HAP	0.00	1.67	0.01	5.77	5.77
Combined HAPs	0.00	1.67	0.03	6.55	8.25

Controlled Emissions (Tons/Yr)					
Pollutant	Tire Buffing	Tire Repair	Extruders	Curing	Total PTE
PM	4.30E-05	0.00	7.49E-06	0.00	5.05E-05
PM10	4.30E-05	0.00	7.49E-06	0.00	5.05E-05
PM2.5	4.30E-05	0.00	7.49E-06	0.00	5.05E-05
VOC	0.00	5.45	0.01	11.05	16.51
NOx	0.00	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00	0.00
Single HAP	0.00	1.67	0.01	5.77	5.77
Combined HAPs	0.00	1.67	0.03	6.55	8.25

Worst-Case Single HAP for Extruders is Methylene Chloride

Worst-Case Single HAP for Curing is Carbon Disulfide

Worst-Case Single HAP for Tire Repair is Trichloroethylene

**Appendix A: Emission Calculations
Particulate, VOC, and HAP Emissions
From Tire Buffing Operations**

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Plt ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Emission Unit Description	Maximum Hourly Throughput (tires/hr)*	Material Removed from Each Tire (lbs/tire)	Maximum Material Removed (lbs/hr)	Maximum Rubber Extruded (lbs/yr)	PM/PM-10/PM2.5 Emission Factor (lb/lb rubber extruded)	Uncontrolled PM/PM-10/PM2.5 Potential to Emit (tons/yr)	Control Device	Control Efficiency	PM/PM-10/PM2.5 Controlled Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber extruded)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber removed)	Total HAPs Potential to Emit (tons/yr)
Tire Buffer (TB-1)	10	10.80	108.00	946,080	9.09E-07	4.30E-04	Wall Filters	95.00%	2.15E-05	2.43E-04	0.11	1.33E-05	0.01
Tire Buffer (TB-2)	10	10.80	108.00	946,080	9.09E-07	4.30E-04	Wall Filters	95.00%	2.15E-05	2.43E-04	0.11	1.33E-05	0.01
Potential Emissions (tons/yr):						8.60E-04			4.30E-05		0.23		0.01

METHODOLOGY

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12, Draft 2008 MS Excel Spreadsheet c04s12_tables.xls for grinding Retread rubber were used.
 Potential to Emit (tons/yr) = Maximum Rubber Extruded (lbs/yr) x Emission Factor (lb/lb rubber extruded) x (1 ton/2,000 lbs)

**Appendix A: Emission Calculations
VOC Emissions
From (2) Tire Repair Areas**

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Pit ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Emission Unit Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (tons/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Blue Tire Repair Cement	12.10	92.50%	0.00%	92.50%	0.00%	N/A	0.0017	20.00	11.19	11.19	0.38	9.13	1.67	0.00	0.00	100%
Universal Cement	6.00	86.70%	0.00%	86.70%	0.00%	N/A	0.0016	20.00	5.20	5.20	0.17	4.00	0.73	0.00	0.00	100%
Bandag Solvent	5.77	97.70%	0.00%	97.70%	0.00%	N/A	0.0016	20.00	5.64	5.64	0.18	4.33	0.79	0.00	0.00	100%
BTP Concentrate	8.33	50.00%	0.00%	50.00%	0.00%	N/A	0.0062	20.00	4.17	4.17	0.52	12.40	2.26	0.00	0.00	100%

Potential Emissions (tons/yr)

1.24 29.85 5.45 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) x Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) x Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) x Gal of Material (gal/unit) x Maximum (units/hr) x (8,760 hr/yr) x (1 ton/2,000 lbs)
Particulate Potential Tons per Year = Maximum (units/hour) x Gal of Mat. (gal/unit) x Density (lbs/gal) x (1- Weight % Volatiles) x (1-Transfer efficiency %) x (8,760 hrs/yr) x (1 ton/2,000 lbs)

**Appendix A: Emission Calculations
HAP Emission Calculations
From (2) Tire Repair Areas**

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Plt ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Emission Unit Description	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Trichloroethylene	Weight % Ethylene Oxide	Trichloroethylene Emissions (tons/yr)	Ethylene Oxide Emissions (tons/yr)
Blue Tire Repair Cement	12.10	0.0017	20.00	92.50%	0.00%	1.67	0.00E+00
Universal Cement	6.00	0.0016	20.00	0.00%	0.00%	0.00	0.00E+00
Bandag Solvent	5.77	0.0016	20.00	0.00%	0.00%	0.00	0.00E+00
BTP Concentrate	8.33	0.0062	20.00	0.00%	0.01%	0.00	4.52E-04

Potential Emissions (tons/yr): Single HAP

1.67

Potential Emissions (tons/yr): Total HAPs

1.67

METHODOLOGY

HAP emission rate (tons/yr) = Density (lb/gal) x Gallons of Material (gal/unit) x Maximum (unit/hr) x Weight % HAP x 8,760 hrs/yr x 1 ton/2,000 lbs

**Appendix A: Emission Calculations
VOC and HAP Emissions
From One (1) Cushion/ Cured Tread Extruder**

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Pit ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Emission Unit Description	Maximum Hourly Throughput (tires/hr)*	Rubber Extruded (lbs/tire)	Maximum Rubber Extruded (lbs/hr)	Maximum Rubber Extruded (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber extruded)	PM/PM-10 Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber extruded)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber removed)	Total HAPs Potential to Emit (tons/yr)	Single HAP (MeCl) Emission Factor (lb/lb rubber removed)	Single HAP (MeCl) Potential to Emit (tons/yr)
One(1) Extruder	10	22	220	1,927,200	7.77E-09	7.49E-06	1.23E-05	0.01	3.52E-05	0.03	1.32E-05	0.01
Potential Emissions (tons/yr):						7.49E-06		0.01		0.03		0.01

METHODOLOGY

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12, Draft 2008 MS Excel Spreadsheet c04s12_tables.xls for extruding Rubber Compound #6 (Tire Tread) were used.
 Potential to Emit (tons/yr) = Maximum Rubber Extruded (lbs/yr) x Emission Factor (lb/lb rubber extruded) x (1 ton/2,000 lbs)

**Appendix A: Emission Calculations
VOC and HAP Emissions
From Hot Air Curing Chambers**

Company Name: CBA/Tredroc Tire Service
Address City IN Zip: 149 S. Colfax Avenue, Griffith, IN 46319
Permit Number: 089-27363-00541
Plt ID: 089-00541
Reviewer: Anne-Marie C. Hart
Date: February 24, 2009

Emission Unit Description	Maximum Hourly Throughput (tires/hr)*	Process Weight (lbs/tire)	Maximum Hourly Process Weight (lbs/hr)	Maximum Process Weight (lbs/yr)	PM/PM-10 Emission Factor (lb/lb rubber)	PM/PM-10 Potential to Emit (tons/yr)	VOC Emission Factor (lb/lb rubber)	VOC Potential to Emit (tons/yr)	Total HAPs Emission Factor (lb/lb rubber)	Total HAPs Potential to Emit (tons/yr)	Single HAP (Carbon Disulfide) Emission Factor (lb/lb rubber)	Single HAP (Carbon Disulfide) Potential to Emit (tons/yr)
Eight (8) Hot Air Curing Chambers	33	26	858	7,516,080	0.00E+00	0.00E+00	2.94E-03	11.05	1.74E-03	6.55	1.53E-03	5.77
Potential Emissions (tons/yr):						0.00E+00		11.05		6.55		5.77

Methodology:

The emission factors are from U.S. EPA, AP-42, 5th Edition, Chapter 4.12. Draft 2008 MS Excel Spreadsheet c04s12_tables.xls for hot air curing of Rubber Compound #22 were used as a worst case scenario.
 Potential to Emit (tons/yr) = Maximum Process Weight (lbs/yr) x Emission Factor (lb/lb rubber) x (1 ton/2,000 lbs)

*Each of the hot air curing chambers has a capacity of 22 tires per four hour period. The source has eight (8) curing chambers on site, but two are used only as backup units. Therefore, calculations were performed for only six (6) curing chambers.