



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: July 6, 2009

RE: Sperry & Rice Mfg. Co LLC / 047-27727-00012

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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**New Source Review and
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY**

**Sperry and Rice Mfg Co, LLC
9146 U.S. 52
Brookville, Indiana 47012**

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

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

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

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

Operation Permit No.: 047-27727-00012	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 6, 2009 Expiration Date: July 6, 2014

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1	General Information [326 IAC 2-8-3(b)]
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
A.4	FESOP Applicability [326 IAC 2-8-2]
B. GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-8-1]
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]
B.4	Term of Conditions [326 IAC 2-1.1-9.5]
B.5	Enforceability [326 IAC 2-8-6] [IC 13-17-12]
B.6	Severability [326 IAC 2-8-4(4)]
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.9	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
B.10	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.11	Compliance Order Issuance [326 IAC 2-8-5(b)]
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
B.13	Emergency Provisions [326 IAC 2-8-12]
B.14	Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.15	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.18	Permit Renewal [326 IAC 2-8-3(h)]
B.19	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.20	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.21	Source Modification Requirement [326 IAC 2-8-11.1]
B.22	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]
B.23	Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
B.25	Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]
B.26	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]
C. SOURCE OPERATION CONDITIONS	17
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.2	Overall Source Limit [326 IAC 2-8]
C.3	Opacity [326 IAC 5-1]
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.6	Fugitive Dust Emissions [326 IAC 6-4]
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]
Compliance Requirements [326 IAC 2-1.1-11]	

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

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

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

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

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

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

Stratospheric Ozone Protection

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

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

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

- D.1.1 Particulate [326 IAC 6-2-3]

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 25

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

- D.2.1 FESOP Limits [326 IAC 2-2][326 IAC 2-8-4][326 IAC 2-4.1]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.2.3 VOC BACT Avoidance Limits [326 IAC 8-1-6]
- D.2.4 Preventative Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4][326 IAC 2-8]
- D.2.6 Worst-Case Single Hazardous Air Pollutants (HAP) [326 IAC 2-8]

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

- D.2.7 Record Keeping Requirements
- D.2.8 Reporting Requirements

Certification Form.....	29
Emergency Occurrence Form.....	30
Quarterly Report Form - VOC EXTMW1 (AC7).....	32
Quarterly Report Form - VOC EXTMW3 (AC9).....	34
Quarterly Report Form - VOC EXTMW4 (AC10).....	36
Quarterly Report Form - VOC EXTMW5 (AC11).....	38
Quarterly Report Form - VOC EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11)...	40
Quarterly Report Form - Total HAP EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11).....	42
Quarterly Report Form - Carbon Sulfide EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11).....	44
Quarterly Deviation and Compliance Monitoring Report Form.....	46
Affidavit for Construction.....	48

Attachment A -U.S. EPA AP-42, Volume 1, Fifth Edition, Chapter 4, Section 12

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rubber products manufacturing plant.

Source Address:	9146 U.S. 52, Brookville, Indiana 47012
Mailing Address:	9146 U.S. 52, Brookville, IN 47012
General Source Phone Number:	765-647-4141
SIC Code:	3061
County Location:	Franklin
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR1, constructed prior to September 21, 1983, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR1.
- (b) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR2, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR2.
- (c) One (1) Mohawk natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR3, constructed in 1979, rated at 6.30 MMBtu/hr, and exhausting to Stack ID: SBLR3.
- (d) One (1) Whirl Power natural gas-fired boiler, with No. 2 fuel oil as a back-up fuel, identified as BLR4, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR4.
- (e) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, and exhausting to Stack ID: SMW3.
- (f) Three (3) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11), approved for construction in 2009, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour each, and exhausting to Stack IDs: SMW 9-SMW 11, respectively.
- (g) One (1) 4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8), constructed in 1989, utilizing the worst-case VOC and HAP emitting rubber compound #8, with a maximum capacity of 514 pounds of rubber per hour, and exhausting to six (6) stacks (Stack IDs: SMW1, SMW2, SMW4-SMW7).

- (h) One (1) Banbury mixer/mill, identified as BBM, with a maximum capacity of 1,250 pounds per hour, and exhausting to Stack ID: SDCBBM and using the following control device:
 - (1) One (1) multi-compartment baghouse for particulate control with an outlet grain loading of less than 0.03 grains per standard cubic feet and less than 4,000 cubic feet per minute.
- (i) Soapstone dusting operations, identified as DUST, and exhausting to Stack ID: SMW8.
- (j) One (1) No. 2 fuel oil storage tank, identified as FOST, with a maximum storage capacity of 10,000 gallons.
- (k) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

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

This stationary source also includes the following insignificant activities:

- (a) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (1) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents; and
 - (2) Brazing, soldering, or welding operations and associated equipment.
- (b) Water based activities, including the following:
 - (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (c) Water related activities, including the following:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process;
 - (2) Steam traps, vents, leaks, and safety relief valves;
 - (3) Laundry operations using only water solutions of bleach or detergents;
 - (4) Boiler water treatment operations, not including cooling towers; and
 - (5) Oxygen scavenging (deaeration) of water.
- (d) Activities related to ventilation, venting equipment, and refrigeration, including the following:
 - (1) Ventilation exhausts, central chiller water systems, refrigeration, and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;
 - (2) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste; and
 - (3) Air vents from air compressors.

- (e) Activities performed using hand-held equipment, including the following:
 - (1) Cutting, excluding cutting torches;
 - (2) Drilling;
 - (3) Grinding;
 - (4) Machining wood, metal, or plastic; and
 - (5) Sawing.

- (f) Housekeeping and janitorial activities and supplies, including the following:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
 - (2) Steam cleaning activities;
 - (3) Rest rooms and associated cleanup operations and supplies; and
 - (4) Mobile floor sweepers and floor scrubbers.

- (g) Office related activities, including the following:
 - (1) Office supplies and equipment;
 - (2) Photocopying equipment and associated supplies;
 - (3) Paper shredding; and
 - (4) Blueprint machines, photographic equipment, and associated supplies.

- (h) Storage equipment and activities, including the following:
 - (1) Pressurized storage tanks and associated piping for Liquid Petroleum Gas (LPG);
 - (2) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
 - (3) Storage of drums containing maintenance raw materials; and
 - (4) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed, except when the material is added or removed.

- (i) Activities generating limited amounts of fugitive dust, including the following:
 - (1) Road salting and sanding.

- (j) Activities associated with production, including the following:
 - (1) Air compressors and pneumatically operated equipment, including hand tools.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 047-27727-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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.5 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

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

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

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.11 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 047-27727-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.15 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR1, constructed prior to September 21, 1983, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR1.
- (b) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR2, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR2.
- (c) One (1) Mohawk natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR3, constructed in 1979, rated at 6.30 MMBtu/hr, and exhausting to Stack ID: SBLR3.
- (d) One (1) Whirl Power natural gas-fired boiler, with No. 2 fuel oil as a back-up fuel, identified as BLR4, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR4.

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

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

D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the four (4) natural gas-fired boilers, identified as BLR1, BLR2, BLR3, and BLR 4, with heat input capacities of 4.20, 4.20, 6.30, 4.20 MMBtu/hr, respectively, shall not exceed 0.6 lb/MMBtu heat input each.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, and exhausting to Stack ID: SMW3.
- (b) Three (3) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11), approved for construction in 2009, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour each, and exhausting to Stack IDs: SMW 9-SMW 11, respectively.

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

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

D.2.1 FESOP Limits [326 IAC 2-2] [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following emission limits for the 3 1/2 inch vulcanized lines:

- (a) The combined VOC emissions from the four (4) 3 1/2 inch vulcanized lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed 97.40 tons per twelve (12) month consecutive period.
- (b) The combined worst-case single HAP emissions (carbon disulfide) from the four (4) 3 1/2 inch vulcanized lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed 8.10 tons per twelve (12) month consecutive period.

Compliance with these limits, combined with the potential to emit VOC, total HAPs, and carbon sulfide from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and MSOP 004-24513-00012, issued on December 26, 2007, IDEM, OAQ has determined that the following requirements represent BACT for the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)):

- (a) The total VOC emissions from the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)) shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total VOC emissions from the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)) shall not exceed 0.0171 pounds of VOC per pound of rubber produced on the line.

D.2.3 VOC BACT Avoidance Limits [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, each line, EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11), shall be limited as follows:

- (a) VOC emissions each of the three (3) new 3 1/2 inch vulcanized lines EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed 24.97 tons per twelve (12) month consecutive period.

Compliance with this limits shall limit the potential to emit VOC from each line to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4] [326 IAC 2-8]

- (a) Compliance with the VOC emission limit in Conditions D.2.1(a), D.2.2(a), and D.2.3 for each of the 3 1/2 inch vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall be determined by the following equation, with compliance determined at the end of each month:

$$\text{VOC Emissions (tons)} = \sum_{n=1}^m \frac{[(\text{Monthly Throughput of each Rubber Compound (lbs/month)}) \times (\text{Emission Factor(s) (lbs/lb)})^* / 2,000]}{n}$$

Where,

n = Month Number (i.e. January = 1, February = 2, etc.); and

m = Total Number of Months in Period.

- (b) Compliance with the VOC emission limit in Condition D.2.2(b) for the 3 1/2 inch vulcanization line (EXTMW1 (AC7)) shall be determined by the following equation, with compliance determined at the end of each month:

$$\text{VOC Emissions (lbs/lb rubber)} = \frac{[(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)})^*]}{2,000} < 0.0171 \text{ pounds of VOC emitted per pound of rubber produced}$$

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

D.2.6 Worst-Case Single Hazardous Air Pollutants (HAP) [326 IAC 2-8]

Compliance with the worst-cast single HAP emission limit in Conditions D.2.1 for each of the 3 1/2 inch vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall be determined by the following equation, with compliance determined at the end of each month:

$$\text{HAP Emissions (tons)} = \sum_{n=1}^m \frac{[(\text{Monthly Throughput of each Rubber Compound (lbs/month)}) \times (\text{Emission Factor(s) (lbs/lb)})^* / 2,000]}{n}$$

Where,

n = Month Number (i.e. January = 1, February = 2, etc.); and
m = Total Number of Months in Period.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.2.1, D.2.2, and D.2.3.
- (1) The monthly throughputs of each type of rubber compound utilized for each of the 3 1/2 inch continuous vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)):
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) Calendar dates covered in the compliance determination period.
- (3) The total VOC and worst-case single HAP emissions for each month calculated based on the equations in Conditions D.2.5(a) and D.2.6.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2, and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Sperry and Rice Mfg Co, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
Mailing Address: 9146 U.S. 52, Brookville, IN 47012
FESOP Permit No.: 047-27727-00012

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Sperry and Rice Mfg Co, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
Mailing Address: 9146 U.S. 52, Brookville, IN 47012
FESOP Permit No.: 047-27727-00012

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW1 (AC7)
 Parameter: VOC
 Limit: less than 25 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{VOC Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)}^*)]$$

< 0.0171 pounds of VOC emitted per pound of rubber produced

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW3 (AC9)
 Parameter: VOC
 Limit: less than 25 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{VOC Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)})]$$

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW4 (AC10)
 Parameter: VOC
 Limit: less than 25 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{VOC Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)})^*]$$

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW5 (AC11)
 Parameter: VOC
 Limit: less than 25 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{VOC Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)})^*]$$

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11)
 Parameter: VOC
 Limit: less than 97.40 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{VOC Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)})^*]$$

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Sperry and Rice Mfg Co, LLC
 Source Address: 9146 U.S. 52, Brookville, Indiana 47012
 Mailing Address: 9146 U.S. 52, Brookville, IN 47012
 FESOP Permit No.: 047-27727-00012
 Facility: EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11)
 Parameter: Carbon Disulfide
 Limit: less than 8.10 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

$$\text{Single HAP Emissions (lbs/lb rubber)} = [(\text{Throughput of each Rubber Compound (lbs/hour)}) \times (\text{Emission Factor(s) (lbs/lb)}^*)]$$

* Emission Factor(s) = Vulcanization Line emission factors for each rubber compound processed. Emission factors are specified as follows:

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 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 AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sperry and Rice Mfg Co, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
Mailing Address: 9146 U.S. 52, Brookville, IN 47012
FESOP Permit No.: 047-27727-00012

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.

Mail to: Permit Administration & Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Sperry and Rice Mfg Co, LLC
9146 US 52
Brookville, Indiana 47012

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Sperry and Rice Mfgs, Co, LLC, completed construction of the three new 3 1/2 vulcanized lines on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 7, 2009 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. 047-27727-00012, Plant ID No. 047-00012 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

**New Source Review and
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY**

**Sperry and Rice Mfg Co, LLC
9146 U.S. 52
Brookville, IN 47012**

Attachment A

U.S. EPA AP-42, Volume 1, Fifth Edition, Chapter 4, Section 12

F047-27727-00012

**AUTOCLAVE CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Cmpd #4 lbs/lb Rubber	Cmpd #5 lbs/lb Rubber	Cmpd #6 lbs/lb Rubber	Cmpd #8 lbs/lb Rubber	Cmpd #9 lbs/lb Rubber	Cmpd #11 lbs/lb Rubber	Cmpd #21 lbs/lb Rubber	Cmpd #22 lbs/lb Rubber
Total VOC		1.49E-04	1.56E-04	1.29E-04	6.65E-05	2.47E-04	6.21E-05	1.83E-04	8.68E-05
Total Speciated Organics		2.33E-04	3.75E-04	3.00E-04	6.15E-03	6.43E-04	4.87E-04	1.39E-03	1.57E-04
Total Organic HAPs		1.24E-04	1.81E-04	6.73E-05	6.04E-03	4.70E-04	3.18E-04	3.38E-04	6.02E-05
Total HAPs		1.24E-04	1.81E-04	6.73E-05	6.04E-03	4.70E-04	3.18E-04	3.38E-04	6.02E-05
1,2,4-Trichlorobenzene	120-82-1						3.41E-10		
1,3-Butadiene	106-99-0	1.11E-06	2.88E-06	5.33E-07		4.19E-07	1.91E-07		2.21E-07
1,4-Dichlorobenzene	106-46-7	1.35E-08	1.21E-08	6.86E-09	2.53E-08	1.17E-07	9.13E-09	3.76E-09	3.74E-09
2-Butanone	78-93-3	8.08E-08	4.78E-07	3.48E-08	1.24E-06	3.02E-07	3.33E-07	2.03E-06	1.07E-07
2-Chloro-1,3-Butadiene	126-99-8						8.79E-06		
2-Chloroacetophenone	532-27-4		3.29E-07				1.03E-06		
2-Methylphenol	95-48-7		3.13E-09		6.93E-09				
4-Methyl-2-Pentanone	108-10-1	3.61E-05	2.71E-07	1.35E-05		2.05E-06			1.25E-05
Acetaldehyde	75-07-0		1.41E-06			3.22E-07		1.36E-07	1.73E-06
Acetonitrile	75-05-8		1.02E-06						
Acetophenone	98-86-2	4.41E-06	2.64E-07	6.08E-06	9.76E-08	4.19E-04	9.64E-08	5.52E-08	4.90E-06
Acrolein	107-02-8		1.57E-07			9.22E-08		5.62E-06	
Aniline	62-53-3	4.20E-06	1.07E-06	7.35E-06	0.00E+00	2.41E-07	6.39E-07		3.87E-06
Benzene	71-43-2	1.09E-05	5.48E-06	8.59E-06	2.07E-05	2.93E-06	1.64E-06	4.69E-06	1.07E-05
Benzidine	92-87-5		3.68E-07						
Biphenyl	92-52-4	6.25E-08	2.27E-07	2.64E-07	3.14E-08	6.31E-08	1.64E-09	0.00E+00	3.69E-07
bis(2-Ethylhexyl)phthalate	117-81-7	2.29E-07	1.57E-07	9.68E-07	2.73E-07	1.52E-07	5.37E-07	2.44E-06	1.17E-07
Carbon Disulfide	75-15-0	4.56E-07	2.74E-06	5.51E-07	5.93E-03	7.62E-06	2.68E-04	1.04E-06	1.86E-06
Carbon Tetrachloride	56-23-5						7.25E-08	4.16E-07	
Carbonyl Sulfide	463-58-1	8.54E-07	1.16E-06	8.08E-07	4.17E-05	1.41E-06	3.98E-06	2.69E-07	6.41E-07
Chlorobenzene	108-90-7	5.22E-09							
Chloroform	67-66-3							3.97E-07	
Chloromethane	74-87-3			6.79E-08		1.86E-07	9.29E-08	6.05E-06	1.29E-07
Cumene	98-82-8	3.79E-07	3.73E-07	7.93E-07	1.46E-06	7.90E-06	1.89E-08	5.68E-07	1.51E-06
Di-n-butylphthalate	84-74-2	2.43E-09	2.37E-09	2.12E-08		7.06E-08	1.57E-08	1.70E-07	3.52E-07
Dibenzofuran	132-64-9	1.61E-08	3.32E-08	1.02E-08	2.81E-09	3.98E-09			
Dimethylphthalate	131-11-3		6.99E-10		3.02E-09		4.31E-09		
Epichlorohydrin	106-89-8				1.85E-06				
Ethylbenzene	100-41-4	3.11E-06	1.32E-06	2.24E-06	2.55E-06	2.53E-06	8.07E-07	2.00E-06	1.14E-06
Hexachlorobutadiene	87-68-3					3.27E-07			4.29E-09
Hexachloroethane	67-72-1		1.29E-08				6.48E-08		
Hexane	110-54-3	1.43E-06	2.00E-06	7.85E-07	3.22E-06	1.76E-06	6.90E-07	1.44E-06	2.91E-07
Isooctane	540-84-1	2.69E-07	4.55E-07	2.00E-07	5.23E-07	1.31E-07	4.97E-06	4.23E-06	1.14E-07
Isophorone	78-59-1	1.95E-07	9.12E-08			9.10E-09			2.58E-07
m-Xylene + p-Xylene		3.40E-05	5.37E-05	6.88E-06	1.34E-05	8.67E-06	3.42E-07	7.36E-06	3.40E-06
Methylene Chloride	75-09-2	9.15E-06	9.11E-05	1.50E-06	2.02E-06	2.72E-06	5.75E-07	4.83E-05	1.24E-05
N-Nitrosodimethylamine	62-75-9		2.17E-10						
Naphthalene	91-20-3	2.74E-07	2.04E-07	6.08E-07	1.64E-07	1.33E-07	3.15E-07	7.08E-08	2.45E-07
o-Toluidine	95-53-4	9.82E-08		5.37E-06					1.28E-07

**AUTOCLAVE CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Cmpd #4 lbs/lb Rubber	Cmpd #5 lbs/lb Rubber	Cmpd #6 lbs/lb Rubber	Cmpd #8 lbs/lb Rubber	Cmpd #9 lbs/lb Rubber	Cmpd #11 lbs/lb Rubber	Cmpd #21 lbs/lb Rubber	Cmpd #22 lbs/lb Rubber			
o-Xylene	95-47-6	3.13E-06	3.87E-06	2.38E-06	3.44E-06	4.99E-06	1.78E-05	9.89E-05	2.04E-06			
Pentachlorophenol	87-86-5						6.29E-09					
Phenol	108-95-2		1.13E-07		4.75E-08	8.49E-07	3.54E-08	6.21E-08				
Propylene Oxide	75-56-9						5.19E-08					
Styrene	100-42-5	9.96E-07	4.99E-07	2.72E-06	1.86E-07	6.42E-07	3.44E-08	1.39E-09	8.24E-07			
t-Butyl Methyl Ether	1634-04-4	6.63E-09	1.24E-07	8.48E-09	7.31E-09		9.50E-07	1.35E-04	7.80E-09			
Tetrachloroethene	127-18-4							1.59E-07				
Toluene	108-88-3	1.30E-05	9.36E-06	5.01E-06	1.59E-05	4.85E-06	5.11E-06	1.50E-05	2.02E-06			

**AUTOCLAVE CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #									
Total VOC										
Total Speciated Organics										
Total Organic HAPs										
Total HAPs										
1,2,4-Trichlorobenzene	120-82-1									
1,3-Butadiene	106-99-0									
1,4-Dichlorobenzene	106-46-7									
2-Butanone	78-93-3									
2-Chloro-1,3-Butadiene	126-99-8									
2-Chloroacetophenone	532-27-4									
2-Methylphenol	95-48-7									
4-Methyl-2-Pentanone	108-10-1									
Acetaldehyde	75-07-0									
Acetonitrile	75-05-8									
Acetophenone	98-86-2									
Acrolein	107-02-8									
Aniline	62-53-3									
Benzene	71-43-2									
Benzidine	92-87-5									
Biphenyl	92-52-4									
bis(2-Ethylhexyl)phthalate	117-81-7									
Carbon Disulfide	75-15-0									
Carbon Tetrachloride	56-23-5									
Carbonyl Sulfide	463-58-1									
Chlorobenzene	108-90-7									
Chloroform	67-66-3									
Chloromethane	74-87-3									
Cumene	98-82-8									
Di-n-butylphthalate	84-74-2									
Dibenzofuran	132-64-9									
Dimethylphthalate	131-11-3									
Epichlorohydrin	106-89-8									
Ethylbenzene	100-41-4									
Hexachlorobutadiene	87-68-3									
Hexachloroethane	67-72-1									
Hexane	110-54-3									
Isooctane	540-84-1									
Isophorone	78-59-1									
m-Xylene + p-Xylene										
Methylene Chloride	75-09-2									
N-Nitrosodimethylamine	62-75-9									
Naphthalene	91-20-3									
o-Toluidine	95-53-4									

**AUTOCLAVE CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #									
o-Xylene	95-47-6									
Pentachlorophenol	87-86-5									
Phenol	108-95-2									
Propylene Oxide	75-56-9									
Styrene	100-42-5									
t-Butyl Methyl Ether	1634-04-4									
Tetrachloroethene	127-18-4									
Toluene	108-88-3									

**Calender
HAP Emission Factor Summary**

7/6/2009

Analyte Name	CAS #	Cmpd #2 lb/lb rubber	Cmpd #12 lb/lb rubber
Total VOC		5.59E-05	4.62E-06
Total Speciated Organics		7.66E-05	4.47E-06
Total Organic HAPs		1.27E-05	2.81E-06
Total HAPs		1.27E-05	2.81E-06
1,1,1-Trichloroethane	71-55-6	3.89E-08	
1,2-Dichloroethane	107-06-2	1.22E-07	
1,4-Dichlorobenzene	106-46-7	3.49E-08	
2-Butanone	78-93-3	2.61E-07	
2-Methylphenol	95-48-7		1.86E-10
4-Aminobiphenyl	92-67-1		1.27E-09
4-Methyl-2-pentanone	108-10-1	6.42E-07	
4-Nitrobiphenyl	92-93-3	2.04E-09	
Acetophenone	98-86-2	4.94E-07	1.17E-09
Acrolein	107-02-8	7.82E-08	
Aniline	62-53-3	9.44E-08	9.64E-09
Benzene	71-43-2	4.54E-08	1.33E-09
Biphenyl	92-52-4	1.78E-08	8.88E-10
bis(2-Ethylhexyl)phthalate	117-81-7	7.34E-07	9.35E-10
Carbon Disulfide	75-15-0	2.41E-06	2.61E-06
Carbonyl Sulfide	463-58-1	0.00E+00	4.19E-08
Chloromethane	74-87-3	2.18E-08	0.00E+00
Cumene	98-82-8	1.29E-06	7.05E-10
Di-n-butylphthalate	84-74-2		2.62E-10
Dibenzofuran	132-64-9		1.95E-10
Ethylbenzene	100-41-4	1.57E-07	2.06E-09
Hexane	110-54-3	5.59E-07	3.83E-08
Hydroquinone	123-31-9	3.73E-08	
Isooctane	540-84-1	2.69E-07	2.27E-09
Isophorone	78-59-1	1.30E-07	
m-Xylene + p-Xylene		2.86E-07	6.09E-09
Methylene Chloride	75-09-2	4.71E-08	3.25E-08
Naphthalene	91-20-3	1.21E-07	2.21E-09
o-Xylene	95-47-6	2.84E-07	2.45E-09
Phenol	108-95-2	1.49E-07	
Styrene	100-42-5	4.86E-07	7.73E-10
Toluene	108-88-3	3.92E-06	5.73E-08

**Extruder
HAP Emission Factor Summary**

7/6/2009

Analyte Name	CAS #	Cmpd #4 lb/lb rubber	Cmpd #6 lb/lb rubber	Cmpd #9 lb/lb rubber	Cmpd #22 lb/lb rubber
Total VOC		5.67E-06	1.23E-05	1.24E-05	8.30E-06
Total Speciated Organics		2.11E-05	9.04E-05	3.51E-05	1.81E-05
Total Particulate Matter		3.11E-08	7.77E-09	1.51E-08	2.34E-08
Total Organic HAPs		9.87E-06	3.51E-05	1.87E-05	8.54E-06
Total Metal HAPs		4.67E-07	1.05E-07	1.95E-07	7.55E-07
Total HAPs		1.03E-05	3.52E-05	1.89E-05	9.30E-06
1,1,1-Trichloroethane	71-55-6	8.47E-08	9.37E-08	6.58E-08	3.48E-08
1,1-Dichloroethene	75-35-4			7.04E-08	
1,3-Butadiene	106-99-0	8.92E-08	5.06E-07	6.01E-08	7.83E-08
1,4-Dichlorobenzene	106-46-7	8.36E-09			1.97E-09
1,4-Dioxane	123-91-1			1.67E-07	
2-Butanone	78-93-3	1.34E-07	1.17E-07	1.15E-07	9.28E-08
2-Chloroacetophenone	532-27-4	6.48E-09	1.68E-09	3.83E-09	5.35E-09
2-Methylphenol	95-48-7			9.28E-09	
4-Methyl-2-Pentanone	108-10-1	5.54E-06	2.66E-06	2.85E-07	1.63E-06
Acetonitrile	75-05-8	1.09E-07	2.19E-07		
Acetophenone	98-86-2	3.65E-08	3.32E-06	8.18E-06	1.65E-08
Acrolein	107-02-8	2.03E-07	3.10E-07	9.10E-08	1.04E-07
Aniline	62-53-3	5.08E-07	2.19E-07	5.52E-09	2.23E-07
Benzene	71-43-2	4.46E-08	2.69E-07	7.51E-08	1.28E-07
Benzidine	92-87-5			1.26E-08	
Biphenyl	92-52-4	4.65E-09	1.68E-08	3.27E-09	4.42E-09
bis(2-Ethylhexyl)phthalate	117-81-7	1.94E-07	1.13E-07	6.70E-08	1.55E-07
Carbon Disulfide	75-15-0	1.09E-07	2.66E-07	9.06E-08	1.16E-07
Chloroethane	75-00-3				5.36E-08
Chloroform	67-66-3				3.81E-08
Chloromethane	74-87-3	7.06E-08	6.64E-08	5.16E-08	1.88E-07
Chromium (Cr) Compounds		2.45E-07	2.25E-08	7.82E-08	2.54E-07
Cobalt (Co) Compounds		1.90E-08	9.92E-09	1.51E-08	1.02E-08
Cumene	98-82-8	3.66E-08	1.36E-07	1.82E-06	1.24E-07
Di-n-butylphthalate	84-74-2	1.87E-07	1.98E-07	3.65E-07	5.01E-08
Dibenzofuran	132-64-9	3.52E-09	3.24E-09	2.51E-09	2.67E-09
Dimethylphthalate	131-11-3		4.27E-09	3.32E-09	
Ethylbenzene	100-41-4	3.30E-08	8.10E-08	3.03E-08	3.57E-07
Hexachlorobutadiene	87-68-3			1.72E-07	
Hexane	110-54-3	1.02E-07	3.94E-07	8.38E-07	2.49E-06
Isooctane	540-84-1	3.81E-08	4.51E-08	2.36E-08	3.71E-09
Isophorone	78-59-1	3.50E-08		4.65E-09	6.45E-08
m-Xylene + p-Xylene		7.01E-08	3.32E-07	1.53E-07	5.22E-07
Methylene Chloride	75-09-2	1.60E-06	1.32E-05	2.69E-06	8.18E-08
N,N-Dimethylaniline	121-69-7	5.45E-09			
Naphthalene	91-20-3	1.08E-07	1.98E-07	1.96E-06	6.30E-08
Nickel (Ni) Compounds		1.99E-07	7.24E-08	1.02E-07	4.91E-07

**Extruder
HAP Emission Factor Summary**

7/6/2009

Analyte Name	CAS #	Cmpd #4 lb/lb rubber	Cmpd #6 lb/lb rubber	Cmpd #9 lb/lb rubber	Cmpd #22 lb/lb rubber
o-Toluidine	95-53-4		1.50E-07		
o-Xylene	95-47-6	3.49E-08	2.58E-07	7.55E-08	4.77E-07
Phenol	108-95-2	3.11E-07	1.84E-07	1.73E-07	5.07E-08
Propylene Oxide	75-56-9		1.75E-06		4.42E-07
Styrene	100-42-5	9.61E-09	7.25E-07	2.38E-08	3.93E-08
Tetrachloroethene	127-18-4	5.32E-08	4.44E-08	7.39E-08	1.71E-07
Toluene	108-88-3	1.07E-07	9.26E-06	8.95E-07	3.67E-07
Trichloroethene	79-01-6				3.30E-07
Vinyl Chloride	75-01-4				3.26E-08

**HOT AIR CURE
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Cmpd #5 lb/lb rubber	Cmpd #8 lb/lb rubber	Cmpd #22 lb/lb rubber
Total VOC		9.37E-04	8.25E-04	2.94E-03
Total Speciated Organics		7.50E-04	1.90E-03	3.01E-03
Total HAPs		3.65E-05	9.76E-04	1.74E-03
Total Organic HAPs		3.65E-05	9.76E-04	1.74E-03
1,1,1-Trichloroethane	71-55-6	1.12E-06		
1,3-Butadiene	106-99-0		1.24E-06	
2-Butanone	78-93-3	1.62E-06		
Acetonitrile	75-05-8	6.31E-07		
Acetophenone	98-86-2	3.06E-07	2.13E-04	1.46E-05
Acrolein	107-02-8	7.92E-07		9.34E-06
Aniline	62-53-3		1.48E-07	8.85E-07
Benzene	71-43-2	1.46E-06	4.88E-05	4.04E-06
Biphenyl	92-52-4	3.77E-07	3.92E-07	3.96E-06
bis(2-Ethylhexyl)phthalate	117-81-7		2.74E-07	1.05E-06
Carbon Disulfide	75-15-0	1.60E-06	6.43E-04	1.53E-03
Chloromethane	74-87-3	4.20E-07		
Cumene	98-82-8		8.08E-08	3.86E-07
Di-n-butylphthalate	84-74-2	7.61E-06		1.00E-06
Dibenzofuran	132-64-9	1.95E-06	2.10E-06	3.29E-06
Dimethylphthalate	131-11-3	4.65E-08	3.19E-08	
Hexane	110-54-3	3.90E-06	3.13E-06	6.86E-06
Isooctane	540-84-1	1.79E-06		
m-Xylene	108-38-3		1.33E-06	
Methylene Chloride	75-09-2	2.38E-06	3.61E-06	1.32E-06
N,N-Dimethylaniline	121-69-7			1.26E-06
Naphthalene	91-20-3	3.23E-06	1.07E-06	2.32E-06
o-Xylene	95-47-6	5.44E-07	4.92E-05	
p-Xylene	106-42-3	1.93E-06	2.95E-06	2.53E-05
Phenol	108-95-2	1.20E-06	3.41E-07	2.16E-06
Styrene	100-42-5	8.61E-07	4.25E-07	4.51E-07
Substituted Quinoline	91-22-5			1.23E-04
Toluene	108-88-3	2.75E-06	4.37E-06	5.25E-06

MILLING
HAP EMISSION FACTOR SUMMARY

7/6/2009

Analyte Name	CAS #	Cmpd #2 lb/lb rubber	Cmpd #3 lb/lb rubber	Cmpd #4 lb/lb rubber	Cmpd #12 lb/lb rubber
Total VOC		1.10E-04	1.13E-04	8.37E-05	4.97E-07
Total Speciated Organics		3.48E-05	4.31E-05	5.04E-05	9.31E-07
Total Organic HAPs		6.39E-06	2.06E-05	1.59E-05	3.00E-07
Total HAPs		6.39E-06	2.06E-05	1.59E-05	3.00E-07
1,1,1-Trichloroethane	71-55-6	3.32E-08			
1,2-Dichloroethane	107-06-2	4.06E-08			
2-Butanone	78-93-3	8.12E-07	7.61E-08	4.06E-07	
2-Methylphenol	95-48-7	1.99E-08			2.31E-11
4-Aminobiphenyl	92-67-1				6.99E-11
4-Methyl-2-pentanone	108-10-1	1.57E-07	1.14E-06	9.12E-06	2.21E-09
Acetophenone	98-86-2		2.80E-07	2.84E-08	3.06E-10
Acrylonitrile	107-13-1	1.29E-07			
Aniline	62-53-3	7.50E-08	5.32E-06	3.48E-06	2.30E-10
Benzene	71-43-2	5.99E-08	1.76E-08	5.39E-08	3.47E-10
Biphenyl	92-52-4	3.55E-08	3.65E-08	4.16E-08	9.50E-11
bis(2-Ethylhexyl)phthalate	117-81-7	3.25E-08	8.63E-07	1.09E-07	1.41E-09
Carbon Disulfide	75-15-0	5.90E-07	9.67E-08	3.76E-07	1.76E-07
Carbonyl Sulfide	463-58-1	8.38E-07			
Cumene	98-82-8		1.47E-08	1.44E-09	2.48E-11
Di-n-butylphthalate	84-74-2	2.49E-09	1.37E-07	1.70E-07	2.22E-10
Dibenzofuran	132-64-9	1.73E-08		1.06E-08	2.89E-11
Dimethylphthalate	131-11-3		7.21E-08		
Ethylbenzene	100-41-4	1.12E-07		7.78E-08	2.61E-10
Hexane	110-54-3	7.16E-07	1.21E-07	2.48E-07	2.94E-08
Isooctane	540-84-1		2.98E-08	3.50E-08	1.63E-09
Isophorone	78-59-1	6.50E-09	1.12E-05	3.07E-07	
m-Xylene + p-Xylene		6.11E-07	3.50E-08	2.56E-07	1.14E-09
Methylene Chloride	75-09-2	1.01E-06	4.13E-07	6.80E-07	4.66E-08
Naphthalene	91-20-3	1.30E-07	3.73E-07	1.66E-07	2.87E-10
o-Xylene	95-47-6	3.46E-07		1.37E-07	1.68E-10
Phenol	108-95-2	4.65E-08			6.99E-10
Styrene	100-42-5	1.55E-07			
Tetrachloroethene	127-18-4	8.39E-08			
Toluene	108-88-3	3.28E-07	3.71E-07	1.95E-07	3.86E-08

**Internal Mixing and Milling
HAP Emission Factor Summary**

7/6/2009

Analyte Name	CAS #	Cmpd #1 lb/lb rubber	Cmpd #2 lb/lb rubber	Cmpd #3 lb/lb rubber	Cmpd #4 lb/lb rubber	Cmpd #5 lb/lb rubber	Cmpd #6 lb/lb rubber	Cmpd #7 lb/lb rubber
Total VOC		6.17E-05	3.91E-05	1.36E-04	3.88E-05	2.15E-04	3.86E-05	1.22E-04
Total Speciated Organics		5.08E-05	5.53E-05	8.92E-05	5.31E-05	6.18E-05	9.84E-05	8.89E-05
Total Organic HAPs		2.10E-05	1.33E-05	5.90E-05	2.54E-05	4.19E-05	4.87E-05	4.19E-05
Total Metal HAPs		9.67E-08	9.71E-09	1.74E-07	7.06E-08	7.72E-08	6.43E-09	1.37E-07
Total HAPs		2.11E-05	1.33E-05	5.91E-05	2.55E-05	4.19E-05	4.87E-05	4.21E-05
Total Particulate Matter		1.75E-04	4.02E-04	9.00E-04	3.00E-04	9.25E-04	4.00E-04	5.66E-04
1,1,1-Trichloroethane	71-55-6		8.03E-08	3.19E-07	4.23E-08	1.84E-07		
1,1-Dichloroethene	75-35-4				5.47E-07			
1,3-Butadiene	106-99-0	9.78E-08			2.17E-07			4.67E-07
1,4-Dichlorobenzene	106-37-6			2.86E-09	7.30E-10	1.52E-09	1.22E-09	1.82E-09
2,4-Dinitrophenol	51-28-5							
2-Butanone	78-93-3	5.91E-06	1.59E-06	9.01E-07	2.74E-06	1.53E-06	4.40E-07	1.40E-06
2-Chloroacetophenone	532-27-4							
2-Methylphenol	95-48-7			8.64E-08	8.34E-10	1.30E-08	6.00E-09	
4-Methyl-2-Pentanone	108-10-1		1.97E-07	1.26E-05	1.49E-05		3.06E-05	
4-Nitrophenol	100-02-7							
Acetaldehyde	75-07-0	6.95E-07						
Acetaldehyde + Isobutane						6.12E-07		
Acetonitrile	75-05-8							
Acetophenone	98-86-2	2.32E-06	2.13E-08	5.13E-08	3.75E-09	1.85E-08	7.67E-08	1.23E-07
Acrolein	107-02-8							
Acrylonitrile	107-13-1							
Aniline	62-53-3		4.80E-07		4.30E-07		9.97E-08	
Benzene	71-43-2	5.46E-08	4.62E-08	1.13E-07	1.14E-07	2.98E-07		9.13E-08
Benzidine	92-87-5							
Biphenyl	92-52-4			5.63E-08	5.42E-09		1.17E-08	
bis(2-Ethylhexyl)phthalate	117-81-7	3.91E-08	3.01E-08	1.19E-07		2.29E-08	1.79E-07	3.34E-08
Bromoform	75-25-2	2.78E-07						
Bromomethane	74-83-9							
Cadmium (Cd) Compounds		9.35E-09	2.40E-09	7.01E-09	2.55E-09	5.05E-09	2.18E-09	3.89E-09
Carbon Disulfide	75-15-0				1.99E-07	1.84E-07	3.83E-06	
Carbon Tetrachloride	56-23-5			1.19E-07				
Carbonyl Sulfide	463-58-1					5.34E-07	1.59E-06	
Chloroethane	75-00-3							
Chloroform	67-66-3							
Chloromethane	74-87-3		3.12E-08		2.98E-08		3.25E-07	
Chromium (Cr) Compounds		3.18E-08	6.99E-09	5.91E-08	2.38E-08	2.72E-08	4.26E-09	1.23E-07
Cumene	98-82-8	2.92E-09		4.00E-09	1.67E-09	1.41E-09	1.21E-08	8.31E-08
Di-n-butylphthalate	84-74-2	8.00E-08	1.61E-08	5.49E-08			1.50E-08	
Dibenzofuran	132-64-9		2.11E-09	3.42E-08	1.41E-09		3.31E-09	
Dimethylaminoazobenzene	60-11-7							
Dimethylphthalate	131-11-3			1.57E-08	1.56E-09			
Ethyl Acrylate	140-88-5							
Ethylbenzene	100-41-4		1.45E-07	2.13E-07	1.17E-07	1.18E-07	2.43E-07	4.32E-06
Hexachloroethane	67-72-1							
Hexane	110-54-3	8.24E-06	1.08E-06	1.58E-06	1.56E-06	5.91E-06	1.49E-06	1.08E-05
Hydroquinone	123-31-9				8.10E-07	2.62E-05		
Isooctane	540-84-1	8.95E-08	7.69E-07	2.87E-07	9.60E-08	1.03E-07	1.59E-07	2.11E-07
Isophorone	78-59-1		6.63E-07		5.93E-08			
Lead (Pb) Compounds		6.35E-09	3.24E-10	1.25E-08	3.42E-09	2.03E-08		1.03E-08
m-Xylene + p-Xylene		2.62E-07	5.79E-07	7.11E-07	5.15E-07	4.11E-07	6.24E-07	1.44E-05
Methylene Chloride	75-09-2	1.10E-06	9.51E-07	3.86E-05	1.86E-06	4.18E-07	2.49E-06	1.14E-06
N-Nitrosodimethylamine	86-30-6							
Naphthalene	91-20-3	2.50E-08	3.33E-08	3.08E-07	1.73E-08	2.52E-07	5.11E-08	4.32E-08
Nickel (Ni) Compounds		4.92E-08		9.53E-08	4.09E-08	2.47E-08		
Nitrobenzene	98-95-3							
o-Toluidine	95-53-4						2.23E-07	
o-Xylene	95-47-6	9.60E-08	3.89E-07	3.20E-07	3.77E-07	1.52E-07	9.51E-07	7.73E-06
Pentachlorophenol	87-86-5							
Phenol	108-95-2	7.21E-08	4.90E-08	2.77E-07	1.47E-08	7.61E-07	4.43E-08	2.39E-08

**Internal Mixing and Milling
HAP Emission Factor Summary**

7/6/2009

Analyte Name	CAS #	Cmpd #1 lb/lb rubber	Cmpd #2 lb/lb rubber	Cmpd #3 lb/lb rubber	Cmpd #4 lb/lb rubber	Cmpd #5 lb/lb rubber	Cmpd #6 lb/lb rubber	Cmpd #7 lb/lb rubber
Propanal	123-38-6							
Propylene Oxide	75-56-9							
Styrene	100-42-5				4.44E-08		4.25E-06	
t-Butyl Methyl Ether	1634-04-4						3.25E-07	
Tetrachloroethene	127-18-4		4.10E-06	9.65E-08	6.59E-08		1.01E-07	
Toluene	108-88-3	1.65E-06	2.06E-06	2.11E-06	5.99E-07	1.73E-06	5.45E-07	1.05E-06
Trichloroethene	79-01-6							
Vinyl Acetate	108-05-4					2.35E-06		
Vinyl Chloride	75-01-4							
NOTES:								
Emission factor is a combination of emissions from productive and non-productive passes. Emissions from non-productive mixing are approximately 90% of the total.								
Particulate matter collection efficiency of 99.3% was observed on a baghouse control device used on this process.								

**PLATEN PRESS CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Cmpd #1 lb/lb rubber	Cmpd #2 lb/lb rubber	Cmpd #3 lb/lb rubber	Cmpd #5 lb/lb rubber	Cmpd #7 lb/lb rubber	Cmpd #9 lb/lb rubber	Cmpd #10 lb/lb rubber	Cmpd #11 lb/lb rubber	Cmpd #12 lb/lb rubber	Cmpd #13 lb/lb rubber	Cmpd #14 lb/lb rubber	Cmpd #16 lb/lb rubber	Cmpd #17 lb/lb rubber
Total VOC		8.27E-04	4.04E-04	1.04E-03	5.87E-04	2.36E-04	1.75E-03	8.66E-04	2.40E-04	6.66E-04	1.42E-03	5.30E-04	8.08E-04	6.23E-03
Total Speciated Organics		2.54E-04	9.19E-04	5.15E-04	2.92E-04	1.46E-04	1.04E-03	1.63E-03	7.31E-04	9.76E-04	1.57E-03	1.33E-03	3.49E-04	2.78E-03
Total HAPs		2.99E-05	7.23E-04	1.57E-04	8.36E-05	4.85E-05	5.05E-04	1.34E-03	4.35E-04	6.68E-04	1.36E-03	1.03E-03	6.37E-05	1.06E-03
Total Organic HAPs		2.99E-05	7.23E-04	1.57E-04	8.36E-05	4.85E-05	5.05E-04	4.35E-04	6.68E-04	1.36E-03	1.03E-03	1.09E-03	1.06E-03	9.11E-04
1,1,1-Trichloroethane	71-55-6	3.54E-06	2.52E-06	3.15E-06	3.80E-06	4.19E-06	4.20E-06	2.52E-06		3.03E-05	3.56E-04	2.05E-06	2.45E-06	1.51E-05

**PLATEN PRESS CURING
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Cmpd #19 lb/lb rubber	Cmpd #20 lb/lb rubber	Cmpd #22 lb/lb rubber	Cmpd #23 lb/lb rubber
Total VOC		6.68E-03	6.13E-04	4.78E-04	2.83E-04
Total Speciated Organics		3.29E-03	3.23E-04	2.95E-04	2.30E-04
Total HAPs		3.47E-04	7.45E-05	2.06E-04	7.26E-05
Total Organic HAPs			7.45E-05	2.06E-04	7.26E-05
1,1,1-Trichloroethane	71-55-6	2.25E-06	3.34E-06	4.51E-06	2.04E-06

**GRINDING OPERATIONS
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Belt 30800151 lb/lb rubber removed	Carcass 30800152 lb/lb rubber removed	Retread 30800153 lb/lb rubber processed	Sidewall / Whitewall 30800154 lb/lb rubber removed
Total VOC		1.78E-03	5.21E-04	2.43E-04	1.59E-02
Total Speciated Organics		2.66E-03	2.53E-03	6.36E-04	1.10E-02
Total Organic HAPs		2.15E-03	1.27E-04	1.33E-05	1.12E-03
Total Metal HAPs		1.34E-05	6.35E-06	6.44E-08	3.72E-05
Total HAPs		2.17E-03	1.27E-04	1.33E-05	1.16E-03
Total Particulate Matter		2.26E-04	5.45E-01	9.09E-07	1.96E-04
1,1,1-Trichloroethane	71-55-6		3.58E-07	2.19E-08	
1,3-Butadiene	106-99-0	2.41E-05	2.65E-05	4.39E-08	2.40E-05
1,4-Dichlorobenzene	106-46-7			6.77E-09	
2-Butanone	78-93-3	6.22E-06	5.13E-07	1.51E-08	2.97E-05
2-Chloro-1,3-Butadiene	126-99-8	8.16E-05			
2-Methylphenol	95-48-7			3.91E-09	
4-Methyl-2-pentanone	108-10-1		1.92E-05	8.44E-07	
4-Nitrobiphenyl	92-93-3	3.80E-07			
Acetaldehyde	75-07-0	1.53E-05			
Acetophenone	98-86-2	1.77E-05	7.13E-07	1.89E-08	3.37E-06
Acrolein	107-02-8	6.44E-06	1.68E-06	4.70E-07	
Aniline	62-53-3		1.97E-05	6.66E-08	4.05E-04
Benzene	71-43-2		4.13E-06	9.96E-06	1.33E-05
Biphenyl	92-52-4			6.63E-09	
bis(2-Ethylhexyl)phthalate	117-81-7	5.30E-05	7.94E-06	1.99E-08	2.76E-05
Cadmium (Cd) Compounds		1.40E-07	8.58E-07		7.38E-07
Carbon Disulfide	75-15-0	3.03E-04	2.58E-06	6.77E-07	1.90E-05
Carbonyl Sulfide	463-58-1	7.14E-06	8.70E-06		
Chloromethane	74-87-3			7.12E-09	
Chromium (Cr) Compounds		2.58E-06	1.44E-06	3.79E-08	1.34E-05
Cobalt (Co) Compounds				8.74E-09	
Cumene	98-82-8				1.13E-06
Di-n-butylphthalate	84-74-2	3.31E-06	2.24E-06	3.87E-08	2.54E-06
Dibenzofuran	132-64-9		1.59E-07		
Ethylbenzene	100-41-4				5.70E-05
Hexane	110-54-3	4.18E-05	1.60E-05		1.24E-04
Isooctane	540-84-1	0.00E+00	1.09E-05		1.15E-04
Isophorone	78-59-1			6.46E-09	
Lead (Pb) Compounds		1.59E-06	2.02E-06		1.55E-05
m-Xylene + p-Xylene		8.51E-06	2.23E-06	5.36E-08	3.18E-05
Methylene Chloride	75-09-2	4.98E-05	2.50E-07	1.67E-07	2.76E-05
Naphthalene	91-20-3	4.02E-06	5.81E-07	2.11E-08	3.81E-06
Nickel (Ni) Compounds		9.13E-06	2.03E-06	1.78E-08	7.51E-06
o-Toluidine	95-53-4		2.55E-06		
o-Xylene	95-47-6	5.40E-06		4.17E-08	1.86E-05
Phenol	108-95-2	8.88E-06	1.66E-06	3.04E-07	1.57E-05

**GRINDING OPERATIONS
HAP EMISSION FACTOR SUMMARY**

7/6/2009

Analyte Name	CAS #	Belt 30800151 lb/lb rubber removed	Carcass 30800152 lb/lb rubber removed	Retread 30800153 lb/lb rubber processed	Sidewall / Whitewall 30800154 lb/lb rubber removed
Propylene Oxide	75-56-9	3.06E-05			
Styrene	100-42-5			9.86E-08	1.69E-05
Tetrachloroethene	127-18-4	1.39E-04		7.58E-09	
Toluene	108-88-3	6.30E-06	6.30E-06	3.82E-07	1.86E-04
Trichloroethene	79-01-6		1.95E-06		

**Tire Cure
HAPS Emission Factor Summary**

updated 1/11/99 by rjd

Analyte Name	CAS #	OEM 205/70 lb/lb rubber	High Performance 205/70 lb/lb rubber	OEM 195/75 lb/lb rubber	Replacement 195/75 lb/lb rubber
Total VOC		1.80E-04	2.11E-04	3.10E-04	1.94E-04
Total Speciated Organics		2.04E-04	2.13E-04	1.46E-04	1.35E-04
Total Organic HAPs		8.59E-05	1.06E-04	8.53E-05	5.43E-05
Total HAPs		8.59E-05	1.06E-04	8.53E-05	5.43E-05
1,1,1-Trichloroethane	71-55-6	1.19E-07	2.41E-07	3.96E-08	9.27E-08
1,1,2,2-Tetrachloroethane	79-34-5			1.03E-07	
1,1-Dichloroethane	75-34-3	7.96E-08			
1,1-Dichloroethene	75-35-4	5.85E-07			
1,2,4-Trichlorobenzene	120-82-1				2.59E-09
1,2-Dibromo-3-Chloropropane	96-12-8			2.06E-07	
1,4-Dichlorobenzene	106-46-7	6.79E-07	1.89E-09	2.49E-09	6.80E-09
2-Butanone	78-93-3	1.55E-06	1.10E-06	6.35E-07	5.37E-07
2-Chloroacetophenone	532-27-4		1.28E-09		
2-Methylphenol	95-48-7		9.00E-09	5.42E-09	6.63E-09
4-Methyl-2-Pentanone	108-10-1	9.60E-06	1.29E-05	1.32E-05	1.26E-05
Acetophenone	98-86-2	1.08E-07	1.07E-07	1.04E-07	1.20E-07
Acrolein	107-02-8				1.28E-07
Aniline	62-53-3	4.36E-06	5.29E-07	3.73E-06	3.57E-06
Benzene	71-43-2	3.51E-07	4.78E-07	2.01E-07	2.41E-07
Benzyl Chloride	100-44-7	4.42E-08			
Biphenyl	92-52-4		5.41E-08	6.78E-08	3.97E-08
bis(2-Ethylhexyl)phthalate	117-81-7		7.00E-09	6.89E-08	5.92E-07
Bromomethane	74-83-9			9.15E-08	
Carbon Disulfide	75-15-0	4.92E-07	6.86E-06	1.32E-05	4.60E-06
Carbonyl Sulfide	463-58-1			5.44E-07	
Chloroform	67-66-3		2.17E-08		
Chloromethane	74-87-3	4.92E-08	6.49E-08	9.25E-08	4.70E-08
Cumene	98-82-8		4.75E-07	2.28E-07	1.36E-07
Di-n-butylphthalate	84-74-2	9.49E-07	2.88E-07	1.97E-07	4.52E-07
Dibenzofuran	132-64-9		5.84E-09	9.11E-09	9.81E-09
Dimethylphthalate	131-11-3	4.06E-09	9.60E-08	7.36E-09	2.09E-08
Ethylbenzene	100-41-4	1.03E-05	1.35E-05	8.55E-06	3.70E-06
Hexane	110-54-3	3.04E-06	5.97E-06	6.62E-07	1.58E-06
Isophorone	78-59-1	4.37E-09	2.06E-08	4.54E-09	7.62E-09
m-Xylene + p-Xylene		2.34E-05	3.36E-05	2.27E-05	1.26E-05
Methylene Chloride	75-09-2	5.62E-06	2.87E-06	4.21E-06	2.18E-06
Naphthalene	91-20-3		2.01E-07	1.76E-07	1.24E-07
o-Toluidine	95-53-4	7.21E-09	5.45E-08	9.12E-08	1.01E-07
o-Xylene	95-47-6	7.73E-06	8.74E-06	6.09E-06	3.06E-06
Phenol	108-95-2	1.30E-07	4.64E-07	3.89E-08	3.87E-07
Styrene	100-42-5	3.98E-06	6.83E-07	3.39E-07	4.71E-07
t-Butyl Methyl Ether	1634-04-4	3.04E-07			
Tetrachloroethene	127-18-4	2.13E-07	9.56E-08	3.83E-08	

**Tire Cure
HAPS Emission Factor Summary**

updated 1/11/99 by rjd

Analyte Name	CAS #	OEM 205/70 lb/lb rubber	High Performance 205/70 lb/lb rubber	OEM 195/75 lb/lb rubber	Replacement 195/75 lb/lb rubber
Toluene	108-88-3	1.22E-05	1.65E-05	9.47E-06	6.88E-06
Trichloroethene	79-01-6				3.68E-08

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Transitioning to a Federally Enforceable State Operating Permit (FESOP) with New Source Review (NSR)

Source Description and Location

Source Name:	Sperry and Rice Mfg Co, LLC
Source Location:	9146 US 52, Brookville, IN 47012
County:	Franklin
SIC Code:	3061
Operation Permit No.:	F 047-27727-00012
Permit Reviewer:	Jillian Bertram

On April 7, 2009, the Office of Air Quality (OAQ) received an application from Sperry and Rice Mfg Co, LLC related to the construction and operation of new emission units at an existing rubber products manufacturing plant and transition from an MSOP to a FESOP.

Existing Approvals

The source has been operating under MSOP No. 047-24513-00012, issued on December 26, 2007.

Due to this application, the source is transitioning from an MSOP to a FESOP.

County Attainment Status

The source is located in Franklin County.

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

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

Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
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. Franklin 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}**
Franklin County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5}

emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Sperry and Rice Mfg Co, LLC on April 7, 2009, relating to the construction of three new vulcanized lines and the transition from an MSOP to a FESOP.

The source consists of the following permitted emission unit(s):

- (a) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR1, constructed prior to September 21, 1983, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR1.
- (b) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR2, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR2.
- (c) One (1) Mohawk natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR3, constructed in 1979, rated at 6.30 MMBtu/hr, and exhausting to Stack ID: SBLR3.
- (d) One (1) Whirl Power natural gas-fired boiler, with No. 2 fuel oil as a back-up fuel, identified as BLR4, constructed in 1979, rated at 4.20 MMBtu/hr, and exhausting to Stack ID: SBLR4.
- (e) One (1) Banburry mixer/mill, identified as BBM, with a maximum capacity of 1,250 pounds per hour, and exhausting to Stack ID: SDCBBM and using the following control device:
- (1) One (1) multi-compartment baghouse for particulate control with an outlet grain loading of less than 0.03 grains per standard cubic feet and less than 4,000 cubic feet per minute.
- (f) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, and exhausting to Stack ID: SMW3.
- (g) One (1) 4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8), constructed in 1989, utilizing the worst-case VOC and HAP emitting rubber compound #8, with a maximum capacity of 514 pounds of rubber per hour, and exhausting to six (6) stacks (Stack IDs: SMW1, SMW2, SMW4-SMW7).
- (h) Soapstone dusting operations, identified as DUST, and exhausting to Stack ID: SMW8.

- (g) One (1) No. 2 fuel oil storage tank, identified as FOST, with a maximum storage capacity of 10,000 gallons.
- (h) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
- (i) Insignificant activities consisting of the following:
 - (1) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (A) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents; and
 - (B) Brazing, soldering, or welding operations and associated equipment.
 - (2) Water based activities, including the following:
 - (A) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
 - (3) Water related activities, including the following:
 - (A) Production of hot water for on-site personal use not related to any industrial or production process;
 - (B) Steam traps, vents, leaks, and safety relief valves;
 - (C) Laundry operations using only water solutions of bleach or detergents;
 - (D) Boiler water treatment operations, not including cooling towers; and
 - (E) Oxygen scavenging (deaeration) of water.
 - (4) Activities related to ventilation, venting equipment, and refrigeration, including the following:
 - (A) Ventilation exhausts, central chiller water systems, refrigeration, and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;
 - (B) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste; and
 - (C) Air vents from air compressors.
 - (5) Activities performed using hand-held equipment, including the following:
 - (A) Cutting, excluding cutting torches;
 - (B) Drilling;
 - (C) Grinding;
 - (D) Machining wood, metal, or plastic; and
 - (E) Sawing.
 - (6) Housekeeping and janitorial activities and supplies, including the following:

- (A) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
 - (B) Steam cleaning activities;
 - (C) Rest rooms and associated cleanup operations and supplies; and
 - (D) Mobile floor sweepers and floor scrubbers.
- (7) Office related activities, including the following:
- (A) Office supplies and equipment;
 - (B) Photocopying equipment and associated supplies;
 - (C) Paper shredding; and
 - (D) Blueprint machines, photographic equipment, and associated supplies.
- (8) Storage equipment and activities, including the following:
- (A) Pressurized storage tanks and associated piping for Liquid Petroleum Gas (LPG);
 - (B) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
 - (C) Storage of drums containing maintenance raw materials; and
 - (D) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed, except when the material is added or removed.
- (9) Activities generating limited amounts of fugitive dust, including the following:
- (A) Road salting and sanding.
- (10) Activities associated with production, including the following:
- (A) Air compressors and pneumatically operated equipment, including hand tools.

The following is a list of the new emission units:

- (a) Three (3) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11), approved for construction in 2009, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour each, and exhausting to Stack IDs: SMW 9-SMW 11, respectively .

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	7.09
PM10 ⁽¹⁾	7.86
PM2.5	7.86
SO ₂	8.40
NO _x	11.83
VOC	145.12
CO	6.82

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

HAPs	Potential To Emit (tons/year)
arsenic	negl.
beryllium	negl.
benzene	negl.
cadmium	negl.
carbon disulfide	24.59
chromium	negl.
dichlorobenzene	negl.
formaldehyde	negl.
hexane	0.15
lead	negl.
manganese	negl.
mercury	negl.
nickel	negl.
selenium	negl.
toluene	negl.
TOTAL HAPs	29.81

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

PTE of the Entire Source After Issuance of the FESOP

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

practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Boilers (BLR1 - BLR4)	1.18	1.95	1.95	8.40	11.83	0.45	6.82	0.15	0.15 - hexane
Banbury Mixer/Mill (BBM)	1.22	1.22	1.22	0.00	0.00	0.20	0.00	0.46	0.23 - carbon disulfide
Four 3 1/2 in. Vulcanization Lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11))	2.99	2.99	2.99	0.00	0.00	97.40 (a)	0.00	16.83 (b)	8.10 - carbon disulfide (a)
One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	0.50	0.50	0.50	0.00	0.00	1.90	0.00	2.46	1.58 - carbon disulfide
Soapstone Dusting Operations (DUST)	1.20	1.20	1.20	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations (Insignificant Activity)	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE of Entire Source	7.09	7.86	7.86	8.4	11.83	99.94	6.82	19.90	9.91 - carbon disulfide
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
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) Emissions are limited to comply with 326 IAC 2-8 (FESOP) (b) The limit established to comply with 326 IAC 2-8 (FESOP) for the single worst HAP (carbon disulfide), reduces the potential to emit total HAPs to less than 25 tons/yr.									

(a) FESOP Status

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The combined VOC emissions from the four (4) 3 1/2 inch vulcanized lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed to 97.40 tons per twelve (12) month consecutive period.

- (2) The combined worst-case single HAP emissions (carbon disulfide) from the four (4) 3 1/2 inch vulcanized lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed 8.10 tons per twelve (12) month consecutive period.

Compliance with these limits, combined with the potential to emit VOC and carbon sulfide from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since all of the boilers (BLR1-BLR4) were constructed prior to June 9, 1989.
- (b) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since all of the No. 2 fuel oil storage tank (FOST) and the VOC and HAP storage tanks each have a capacity of less than the threshold of 75 cubic meters.
- (c) The requirements of the New Source Performance Standard for Standards of Performance for the Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB (326 IAC 12), are not included in the permit, since the source manufactures miscellaneous rubber products, not rubber tires.
- (d) 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)

- (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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the source is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

Boilers (BLR1-BLR4)

- (h) 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-3(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have a heat input capacity of 10 MMBtu/hr or less and which began operation before September 21, 1983, are subject to this rule. The four (4) boilers, identified as BLR1, BLR2, BLR3, and BLR4, with heat input ratings of 4.2, 4.2, 6.3, and 4.2 MMBtu per hour, respectively, each constructed prior to September 21, 1983, firing natural gas or No. 2 fuel oil, are subject to 326 IAC 6-2-3. Pursuant to this rule particulate

emissions shall be limited by the following equation:

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

$$Pt = \frac{50 \times 0.67 \times 21.14}{76.5 \times 18.9^{0.75} \times 4^{0.25}} = 0.94 \text{ lb/MMBtu}$$

Where:

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

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter (μ/m^3) for a period not to exceed a sixty (60) minute time period.

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

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. The stack heights for the associated boilers, identified as BLR1, BLR 2, BLR 3, and BLR 4, are 23, 22, 20, and 22 feet, respectively. Therefore, the average stack height calculated as follows is 21.14:

$$h = \frac{\sum_{i=1}^n (H_i \times pa_i \times Q_i)}{\sum_{i=1}^n (pa_i \times Q_i)}$$

Where:

pa_i = Emission rate in lb/MMBtu using the emission factor from AP-42;

H_i = Stack height in feet for each boiler;

Q_i = Maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input of each boiler.

The allowable particulate emission rate from each boiler, based on the above equation, is 0.94 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-3(e), the allowable particulate emission rate for any facility which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable particulate emission rate for the four boilers (BLR1, BLR2, BLR3, and BLR4) is 0.6 pounds of PM per MMBtu heat input each.

Boiler PM Compliance Determination (Natural Gas):

$$1.9 \text{ lb/MMscf} \times 1/1,020 \text{ (scf/Btu)} = 0.0019 \text{ lb PM/MMBtu}$$

Boiler PM Compliance Determination (No. 2 Fuel Oil):

$$2.0 \text{ lb/kgal} \times 1\text{Kgal}/1,000 \text{ gal} \times 1/140,000 \text{ gal/Btu} \times 1,000,000 \text{ Btu/MMBtu} = 0.01 \text{ lb PM/MMBtu}$$

The boilers (BLR1, BLR2, BLR3, and BLR 4) emit a maximum of 0.01 pounds of PM per MMBtu heat input each. Therefore, the boilers are able to comply with 326 IAC 6-2-3.

- (i) 326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

- (j) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Banbury Mixer/Mill (BBM)

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The mixer/mill is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.

Operation of the baghouse is not necessary for this unit to remain exempt.

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

Existing 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7)

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
EXTMW1 (AC7) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.
- (o) 326 IAC 8-1-6 (New facilities: General Reduction Requirements)
The requirements of 326 IAC 8-1-6 are applicable to facilities constructed after January 1, 1980 and which have the potential to emit of 25 tons per year or more of VOCs. The continuous vulcanization line identified as EXTMW1 (AC7) was constructed after January 1, 1980 and has a potential to emit of VOCs greater than 25 tons per year (See Appendix A).

Pursuant to 326 IAC 8-1-6 and M047-24513-00012, the following BACT analysis was reviewed and accepted by IDEM, OAQ and will remain in effect for the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)):

- (a) The total VOC emissions from the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)) shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total VOC emissions from the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)) shall not exceed 5.708 pounds of VOC per hour.

Refer to M047-24513-00012 for the 326 IAC 8-1-6 (BACT) analysis.

- (1) Compliance with the VOC emission limits in (a) above for the 3 1/2 inch vulcanization line (EXTMW1 (AC7)) shall be determined by the following equation, with compliance determined at the end of each month:

$$\text{VOC Emissions (tons)} = \sum_{n=1}^m \left[\frac{\text{(Rubber Compound Throughputs (lbs/hour) x Emission Factor(s)(lbs/lb)}^n}{2,000} \right]$$

< 25.0 tons per twelve (12) consecutive month period

Where,

n = Month Number (i.e. January = 1, February = 2, etc.); and
m = Total Number of Months in Period.

- (2) Compliance with the VOC emission limits in (b) above for the 3 1/2 inch vulcanization line (EXTMW1 (AC7)) shall be determined by the following equation, with compliance determined at the end of each month:

$$\text{VOC Emissions (lbs/hour)} = [(\text{Rubber Compound Throughputs (lbs/hour)} \times \text{Emission Factor(s)(lbs/lb)}^n)] < 5.708 \text{ pounds per hour of operation}$$

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12 (See Attachment A of F047-27727-00012).

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

Three new 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)

- (r) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The three new 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11) are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of each process is less than 0.551 pounds per hour.
- (s) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from each new unit is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from each new line to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, each line shall be limited as follows:

- (1) VOC emissions each of the three new 3 1/2 inch vulcanized lines EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) shall not exceed 24.97 tons per twelve (12) month consecutive period.

Compliance with these limits shall limit the potential to emit VOC from each line to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable. Compliance shall be determined by the following equation:

$$\text{VOC Emissions (tons)} = \sum_{n=1}^m [(\text{Rubber Compound Throughputs (lbs/hour)} \times \text{Emission Factor(s)(lbs/lb)}^n) / 2,000] < 25.0 \text{ tons per twelve (12) consecutive month period}$$

Where,

n = Month Number (i.e. January = 1, February = 2, etc.); and
m = Total Number of Months in Period.

Emission factors are from U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12 (See Attachment A of F047-27727-00012).

- (t) There are no other 326 IAC 8 Rules that are applicable to the lines.
- (u) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (v) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8)

- (w) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
EXTMW2 (AC8) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.
- (x) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
EXTMW2 (AC8) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the unit is less than twenty-five (25) tons per year.
- (y) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (z) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Soapstone dusting operations, identified as DUST

- (aa) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The soapstone dusting operation is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.
- (bb) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (cc) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

One (1) No. 2 fuel oil storage tank, identified as FOST

- (dd) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
The requirements of 326 IAC 8-4-3 apply to petroleum liquid storage vessels with capacities greater than 39,000 gallons contain VOCs whose true vapor pressure is greater than 10.5 kPa, which were installed after January 1, 1980. The construction date of the one (1) 10,000 gallon No. 2 fuel oil storage tank is unknown. However, even though this storage vessel may have been constructed after January 1, 1980, the requirements of 326 IAC 8-4-3 do not apply because the storage tank has a capacity of less than 39,000 gallons.
- (ee) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (ff) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
EXTMW1(AC7), EXTMW3-5(AC9-11)	Monthly Calculations	Quarterly

- (b) The testing requirements applicable to this source are as follows:

There are no testing requirements at this source because the emission units limited to comply with 326 IAC 2-8 and 326 IAC 8-1-6 are uncontrolled emission units.

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 April 7, 2009.

The construction of new units and operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. 047-27727-00012. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jillian Bertram 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)234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBtu/hr <100
Small Boilers (BLR1, BLR2, BLR3, BLR4)**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

Heat Input Capacity
MMBtu/hr

18.90

Potential Throughput
MMCF/yr

162.32

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM-10*	SO ₂	NO _x	VOC	CO
	1.90	7.60	0.60	100.00 **see below	5.50	84.00
Potential Emissions in	0.15	0.62	0.05	8.12	0.45	6.82

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

Worst-case pollutants for natural gas combustion are VOC and CO. Worst-case pollutants for No. 2 fuel oil combustion are PM/PM-10, SO₂, and NO_x.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Bt

MMCF = 1,000,000 Cubic Feet of Gas

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Potential Emissions (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAP emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBtu/hr <100
Small Boilers (BLR1, BLR2, BLR3, BLR4)
HAP Emissions

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

HAPs - Organics					
Emission Factor in lb/l	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emissions in	1.70E-04	9.74E-05	6.09E-03	1.46E-01	2.76E-04

HAPs - Metals					
Emission Factor in lb/l	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential Emissions in	4.06E-05	8.93E-05	1.14E-04	3.08E-05	1.70E-04

Methodology is the same as previous page.

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

Appendix A: Emissions Calculations
No. 2 Fuel Oil Boiler (< 100 MMBtu/hr) (Back-up Fuel)
Small Boilers (BLR1, BLR2, BLR3, BLR4)

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

Heat Input Capacity Potential Throughput S = Weight % Sulfur
MMBtu/hr kgals/year 0.10

18.90 1182.60

Emission Factor in lb/k	Pollutant					
	PM*	PM-10	SO ₂	NO _x	VOC	CO
	2.00	3.30	14.20 <i>(142.0S)</i>	20.00	0.34	5.00
Potential Emissions in tons/yr	1.18	1.95	8.40	11.83	0.20	2.96

Methodology

Worst-case pollutants for natural gas combustion are VOC and CO. Worst-case pollutants for No. 2 fuel oil combustion are PM/PM-10, SO₂, and NO_x.

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)

Potential Emissions (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See next page for HAP emission calculations.

**Appendix A: Emissions Calculations
No. 2 Fuel Oil Boiler (< 100 MMBtu/hr)
Small Boilers (BLR1, BLR2, BLR3, BLR4)
HAP Emissions**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

HAPs - Metals					
Emission Factor in lb/MMBtu	Arsenic 4.00E-06	Beryllium 3.00E-06	Cadmium 3.00E-06	Chromium 3.00E-06	Lead 9.00E-06
Potential Emissions in tons/yr	3.31E-04	2.48E-04	2.48E-04	2.48E-04	7.45E-04

HAPs - Metals (continued)				
Emission Factor in lb/MMBtu	Mercury 3.00E-06	Manganese 6.00E-06	Nickel 3.00E-06	Selenium 1.50E-05
Potential Emissions in tons/yr	2.48E-04	4.97E-04	2.48E-04	1.24E-03

Methodology is the same as previous page.

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Banbury Mixer/Mill (BBM)**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 8 Compound VOC Emission Factor (lb/lb rubber)*	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total VOC Emissions (tons/yr)	Total HAP Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)	Particulate (PM/PM-10) Control Device	PM/PM-10 Emissions (tons/yr)	Controlled PM/PM-10 Emissions (tons/yr)***
Banbury Mixing (BBM)**	1,250.00	10,950,000	1.47E-05	5.58E-05	2.81E-05	2.22E-04	0.08	0.31	0.15	Baghouse	1.22	0.23
Banbury Milling (BBM)	1,250.00	10,950,000	2.14E-05	2.89E-05	1.45E-05	0.00E+00	0.12	0.16	0.08	None	0.00	0.00
Potential to Emit (tons/yr) =							0.20	0.46	0.23		1.22	0.23

Methodology

Potential to Emit (tons/yr) = Maximum Process Throughput (lb/yr) x Emission Factor (lb/lb rubber) x 1/2000 (ton/lbs)

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

*The worst-case emission estimates are based on rubber compound #8.

**The particulate emissions from the Banbury Mixer/Mill are controlled by a baghouse. The control efficiency has conservatively been estimated at 81% (Overall Control Efficiency = 90% Capture x 90% Control = 81%)

***Controlled PM/PM-10 Emissions (tons/yr) = Maximum Process Throughput (lb/yr) x PM/PM-10 Emission Factor (lb/lb rubber) x 1/2000 (ton/lbs) x (1-Overall Control Efficiency)

Appendix A: Emissions Calculations
Five Vulcanization Lines (EXTMW1 (AC 7), EXTMW2 (AC8), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11))

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

1. 3 1/2 inch vulcanization line (EXTMW1 (AC7)) (Compound #10)

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
3 1/2 vulcanization line (EXTMW1)	476.00	4,169,760	1.63E-02	-	0.00E+00	2.96E-03	2.52E-03	34.01	0.00	6.17	5.25
Mixing											
To 3 1/2 vulcanization line (EXTMW1)	476.00	4,169,760	2.91E-04	-	3.58E-04	1.20E-04	1.03E-04	0.61	0.75	0.25	0.21
Milling											
To 3 1/2 vulcanization line (EXTMW1)	476.00	4,169,760	4.25E-04	-	6.96E-08	6.22E-05	5.32E-05	0.89	0.00	0.13	0.11
Extrusion											
To 3 1/2 vulcanization line (EXTMW1)	476.00	4,169,760	6.97E-05	-	4.32E-08	6.43E-05	5.49E-05	0.15	0.00	0.13	0.11
Potential to Emit (tons/yr) from EXTMW1 =			1.71E-02		3.58E-04	3.21E-03	2.73E-03	35.64	0.75	6.69	5.69

2. 4 1/2 inch vulcanization line (EXTMW2 (AC8)) (Compound #8)

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	8.25E-04	0.00E+00	9.76E-04	6.43E-04	1.86	0.00	2.20	1.45
Mixing											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	1.47E-05	2.22E-04	5.58E-05	2.81E-05	0.03	0.50	0.13	0.06
Milling											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	2.14E-05	0.00E+00	2.89E-05	1.45E-05	0.00	0.00	0.07	0.03
Extrusion											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	3.52E-06	2.67E-08	2.99E-05	1.50E-05	0.01	0.00	0.07	0.03
Potential to Emit (tons/yr) from EXTMW2 =				8.65E-04	2.22E-04	1.09E-03	7.01E-04	1.90	0.50	2.46	1.58

Appendix A: Emissions Calculations
Five Vulcanization Lines (EXTMW1 (AC 7), EXTMW2 (AC8), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11))

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

3. 3 1/2 inch vulcanization line (EXTMW3 (AC9)) (Compound #10)

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	1.63E-02	-	0.00E+00	2.96E-03	2.52E-03	34.01	0.00	6.17	5.25
Mixing											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	2.91E-04	-	3.58E-04	1.20E-04	1.03E-04	0.61	0.75	0.25	0.21
Milling											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	4.25E-04	-	6.96E-08	6.22E-05	5.32E-05	0.89	0.00	0.13	0.11
Extrusion											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	6.97E-05	-	4.32E-08	6.43E-05	5.49E-05	0.15	0.00	0.13	0.11
Potential to Emit (tons/yr) from EXTMW3 =			1.71E-02		3.58E-04	3.21E-03	2.73E-03	35.64	0.75	6.69	5.69

4. 3 1/2 inch vulcanization line (EXTMW4 (AC10)) (Compound #10)

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
3 1/2 vulcanization line (EXTMW4)	476.00	4,169,760	1.63E-02	-	0.00E+00	2.96E-03	2.52E-03	34.01	0.00	6.17	5.25
Mixing											
To 3 1/2 vulcanization line (EXTMW4)	476.00	4,169,760	2.91E-04	-	3.58E-04	1.20E-04	1.03E-04	0.61	0.75	0.25	0.21
Milling											
To 3 1/2 vulcanization line (EXTMW4)	476.00	4,169,760	4.25E-04	-	6.96E-08	6.22E-05	5.32E-05	0.89	0.00	0.13	0.11
Extrusion											
To 3 1/2 vulcanization line (EXTMW4)	476.00	4,169,760	6.97E-05	-	4.32E-08	6.43E-05	5.49E-05	0.15	0.00	0.13	0.11
Potential to Emit (tons/yr) from EXTMW4 =			1.71E-02		3.58E-04	3.21E-03	2.73E-03	35.64	0.75	6.69	5.69

Appendix A: Emissions Calculations
Five Vulcanization Lines (EXTMW1 (AC 7), EXTMW2 (AC8), EXTMW3 (AC9), EXTMW4 (AC10), EXTMW5 (AC11))

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

5. 3 1/2 inch vulcanization line (EXTMW5 (AC11)) (Compound #10)

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
3 1/2 vulcanization line (EXTMW5)	476.00	4,169,760	1.63E-02	-	0.00E+00	2.96E-03	2.52E-03	34.01	0.00	6.17	5.25
Mixing											
To 3 1/2 vulcanization line (EXTMW5)	476.00	4,169,760	2.91E-04	-	3.58E-04	1.20E-04	1.03E-04	0.61	0.75	0.25	0.21
Milling											
To 3 1/2 vulcanization line (EXTMW5)	476.00	4,169,760	4.25E-04	-	6.96E-08	6.22E-05	5.32E-05	0.89	0.00	0.13	0.11
Extrusion											
To 3 1/2 vulcanization line (EXTMW5)	476.00	4,169,760	6.97E-05	-	4.32E-08	6.43E-05	5.49E-05	0.15	0.00	0.13	0.11
Potential to Emit (tons/yr) from EXTMW5 =			1.71E-02		3.58E-04	3.21E-03	2.73E-03	35.64	0.75	6.69	5.69

Methodology

Potential to Emit (tons/yr) = Maximum Process Throughput (lb/yr) x Emission Factor (lb/lb rubber) x 1/2000 (ton/lbs)

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

* The 4 1/2 inch vulcanization line cannot process rubber compound #10 and processes compound #8 at the highest production rate.

**Appendix A: Emissions Calculations
Soapstone Dusting Operations (DUST)**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	PM/PM-10 Emission Factor (lb/lb rubber)	PM/PM-10 Emissions (tons/yr)
5.50	48,180.00	5.00E-02	1.20

Methodology

Potential Emissions (tons/yr) = Process Throughput (lb/yr) x Emission Factor (lb/lb rubber) x 1/2000 (ton/lbs)

Emission Factors are from the Rubber Manufacturers Association Emission Factors Project (September 1996), as provided by the source in application M047-24513-00012

**Appendix A: Emissions Calculations
Welding**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Shielded Metal Arc Welding (E308)	1	0.005707763	0.0108	0.000252	0.000043	0.000394	6.16E-05	1.44E-06	2.45E-07	2.25E-06	3.93E-06
Shielded Metal Arc Welding (E7018)	1	0.017123288	0.0184	0.00103	0.000002	0.000006	3.15E-04	1.76E-05	3.42E-08	1.03E-07	1.78E-05
Gas Metal Welding (E70S)	1	0.005707763	0.0052	0.000318	0.000001	0.000001	2.97E-05	1.82E-06	5.71E-09	5.71E-09	1.83E-06
EMISSION TOTALS											
Potential Emissions lbs/hr							4.06E-04	2.09E-05	2.85E-07	2.36E-06	2.35E-05
Potential Emissions lbs/day							9.75E-03	5.01E-04	6.85E-06	5.66E-05	5.65E-04
Potential Emissions tons/year							1.78E-03	9.15E-05	1.25E-06	1.03E-05	1.03E-04

METHODOLOGY

*Emission factors are default values for carbon steel unless a specific electrode type is noted in the process column.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Sperry & Rice Manufacturing Company, LLC
Address: 9146 U.S. 52, Brookville, IN 47012
Permit Number: F047-27727-00012
Reviewer: Jillian Bertram
Date: 04/14/09

Potential to Emit (tons/year)							
Emissions Generating Activity							
Pollutant	Boilers (Natural Gas/No. 2 Fuel Oil Combustion)	Banbury Mixer/Mill (BBM)	Four 3 1/2 in. Vulcanization Lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11))	One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	Soapstone Dusting Operations	Welding Operations	Total
PM	1.18	1.22	2.99	0.50	1.20	0.0018	7.09
PM-10	1.95	1.22	2.99	0.50	1.20	0.0018	7.86
SO ₂	8.40	0.00	0.00	0.00	0.00	0.00	8.40
NOx	11.83	0.00	0.00	0.00	0.00	0.00	11.83
VOC	0.45	0.20	142.58	1.90	0.00	0.00	145.12
CO	6.82	0.00	0.00	0.00	0.00	0.00	6.82
total HAPs	0.15	0.46	26.74	2.46	0.00	0.0001	29.81
worst-case single HAP	0.15	0.23	22.78	1.58	0.00	0.0001	24.59
	Hexane	Carbon Disulfide	Carbon Disulfide	Carbon Disulfide		Manganese	Carbon Disulfide

Total emissions based on rated capacity at 8,760 hours/year without controls and limitations.

Limited Potential to Emit (tons/year)							
Emissions Generating Activity							
Pollutant	Boilers (Natural Gas/No. 2 Fuel Oil Combustion)	Banbury Mixer/Mill (BBM)	Four 3 1/2 in. Vulcanization Lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) *	One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	Soapstone Dusting Operations	Welding Operations	Total
PM	1.18	1.22	2.99	0.50	1.20	0.0018	7.09
PM-10	1.95	1.22	2.99	0.50	1.20	0.0018	7.86
SO ₂	8.40	0.00	0.00	0.00	0.00	0.0000	8.40
NOx	11.83	0.00	0.00	0.00	0.00	0.0000	11.83
VOC	0.45	0.20	97.40	1.90	0.00	0.0000	99.94
CO	6.82	0.00	0.00	0.00	0.00	0.0000	6.82
total HAPs	0.15	0.46	21.90	2.46	0.00	0.0001	24.97
worst-case single HAP	0.15	0.23	8.10	1.58	0.00	0.0001	9.91
	Hexane	Carbon Disulfide	Carbon Disulfide	Carbon Disulfide		Manganese	Carbon Disulfide

Total emissions based on rated capacity at 8,760 hours/year, after enforceable controls and limitations.

* The combined emission of VOC from the three 3 1/2 inch vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) is limited to less than 97.4 tons/yr in order to comply with 326 IAC 2-8 (FESOP). The combined emission of Total HAP from the three 3 1/2 inch vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) is limited to less than 21.90 tons/yr in order to comply with 326 IAC 2-8 (FESOP). The combined emission of Carbon Disulfide from the three 3 1/2 inch vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), EXTMW4 (AC10), and EXTMW5 (AC11)) is limited to less than 8.1 tons/yr in order to comply with 326 IAC 2-8 (FESOP)



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: James R. Gregory
Sperry & Rice Mfg. Co. LLC
9146 US Hwy 52
Brookville IN 47012

DATE: July 6, 2009

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

SUBJECT: Final Decision
FESOP
047-27727-00012

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Bill Huston Crown Solutions Co. LLC
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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July 6, 2009

TO: Brookville Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Sperry & Rice Mfg. Co. LLC
Permit Number: 047-27727-00012

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	BLOCCHET 7/6/2009 Sperry & Rice Mfg Co. LLC 047-27727-00012 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		James R Gregory Sperry & Rice Mfg Co, LLC 9146 US Hwy 52 Brookville IN 47012 (Source CAATS) <i>Via Confirmed Delivery</i>										
2		Franklin County Commissioners 459 Main Street Brookville IN 47012 (Local Official)										
3		Franklin County Health Department 459 Main St, Courthouse Brookville IN 47012-1405 (Health Department)										
4		Brookville Town Twp Public Library 919 Main St Brookville IN 47012-1498 (Library)										
5		Brookville Town Council 634 Main St. Brookville IN 47012 (Local Official)										
6		Mr. Bill Huston Crown Solutions Co LLC 945 South Brown Rd Vandalia OH 45377 (Consultant)										
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12												
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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