



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: August 24, 2009

RE: Snider Tire, Inc. / 179-28204-00037

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

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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August 24, 2009

Mr. Timothy J Puck
Snider Tire, Inc.
200 E Meadowview Rd
Greensboro, NC 27406

Re: Exempt Construction and Operation Status,
179-28204-00037

Dear Mr. Timothy J Puck:

The application from Snider Tire, Inc., received on July 6, 2009, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary truck tire retreading source located at 1400 W Wiley Ave, Bluffton, IN, is classified as exempt from air pollution permit requirements:

- (a) One (1) natural gas fired water boiler, identified as BOIL, approved for construction in 2009, with a maximum capacity of 1.44 MMBtu/hr, and exhausting to stack A05.
- (b) One (1) tire grinding operation, identified as EU01, with two (2) tire grinders, identified as BUF01 and BUF02, approved for construction in 2009, with a maximum capacity of 600 tires per day, each with the rubber dust collected by an integral cyclone and exhausting to stacks A01 and A02, respectively. The rubber dust collected by the cyclones is emptied into a truck trailer that exhausts back to the cyclones.
- (c) One (1) tire dissolution application and repair operation, identified as REP, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.
- (d) One (1) tire building operation, identified as EU02, with two (2) tire builders, identified as TB01 and TB02, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.
- (e) One (1) tire curing operation, identified as EU03, with two (2) curing chambers, identified as CUR01 and CUR02, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.

The following conditions shall be applicable:

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 thirty percent (30%) 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.

2. 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.
3. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processing), the allowable particulate emission rate from the tire grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

The cyclones shall be in operation at all times the tire grinding processes are in operation, in order to comply with this limit.

4. Pursuant to Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)],
 - (a) An inspection shall be performed each calendar quarter of each cyclone controlling the grinding operations.
 - (b) In the event that a cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emission unit shall be shut down no later than the completion of the processing of the material in the emission line.
 - (c) To document compliance, the Permittee shall maintain records of the results of these inspections.

This exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Christine L. Filutze, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-233-8397 or at 1-800-451-6027 (ext 38397)

Sincerely,



Alfred C. Dumauel, Ph. D., Section Chief
Permits Branch
Office of Air Quality

ACD/clf

cc: File - Wells County
Wells County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

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

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	Snider Tire, Inc.
Source Location:	1400 W Wiley Ave, Bluffton, IN 46714
County:	Wells
SIC Code:	7534
Exemption No.:	179-28204-00037
Permit Reviewer:	Christine L. Filutze

On July 6, 2009, the Office of Air Quality (OAQ) received an application from Snider Tire, Inc. related to the construction and operation of a new truck tire retreading source.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

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

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Wells County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 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
Wells County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Snider Tire, Inc. on July 6, 2009, relating to a new truck tire retreading operation.

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

- (a) One (1) natural gas fired water boiler, identified as BOIL, approved for construction in 2009, with a maximum capacity of 1.44 MMBtu/hr, and exhausting to stack A05.
- (b) One (1) tire grinding operation, identified as EU01, with two (2) tire grinders, identified as BUF01 and BUF02, approved for construction in 2009, with a maximum capacity of 600 tires per day, each with the rubber dust collected by an integral cyclone and exhausting to stacks A01 and A02, respectively. The rubber dust collected by the cyclones is emptied into a truck trailer that exhausts back to the cyclones.
- (c) One (1) tire dissolution application and repair operation, identified as REP, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.
- (d) One (1) tire building operation, identified as EU02, with two (2) tire builders, identified as TB01 and TB02, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.
- (e) One (1) tire curing operation, identified as EU03, with two (2) curing chambers, identified as CUR01 and CUR02, approved for construction in 2009, with a maximum capacity of 600 tires per day, and exhausting to stacks A03 and A04.

"Integral Part of the Process" Determination

The applicant has submitted the following information to justify why the two (2) tire grinding cyclones should be considered an integral part of the tire grinding operation:

- (a) The two (2) tire grinding cyclones should be considered an integral part of the tire grinding operation, since there is significant economic benefit gained by collecting the tire grinding dust for resale and the cyclones are necessary to prevent fires. The cost of installing and operating the tire grinding cyclones and the benefit from resale of the collected tire grinding dust are as follows:
- (1) assuming a life span of 10 years, the annualized initial capital cost (equipment and installation) of the tire grinding cyclone systems is $\$23,771/10 \text{ years} = \$2,377 \text{ per year}$.
 - (2) the tire grinding operation has an annual operating cost of \$18,983 per year, consisting only of the electrical cost to operate the cyclones; and an annual labor cost of \$2,380.
 - (3) the collected tire grinding dust is sold for reuse (assuming a rate of \$0.02 per pound),

generating approximately \$53,350 per year (\$4,446 per month) in revenue.

Based on the costs and benefits above, the overall net annualized cost benefit of the tire grinding cyclones is \$29,610 per year (\$53,350 - \$2,377 - \$18,983 - \$2,380).

- (b) The high speed shearing action of the tire grinders creates high temperatures and sparks. The simultaneous presence of tire grinding dust and ignition sources may result in fires at the grinding units. In order to prevent fires, the tire grinding dust will be removed from the grinding units by the tire grinding cyclones. The tire grinding cyclones are integral to the process, because they serve a primary purpose other than pollution control. The tire grinding cyclones are necessary to prevent fires at the grinding units. Any fires at the grinding units could cause equipment damage and, therefore, must be prevented.

The constant operation of the tire grinding cyclones while the grinding units are in operation also have an overall positive net economic effect, since they prevent fires that would result in damage to the grinding units and unplanned shutdowns of the process. Damage to the machinery would result in repair and replacement costs. Process shutdowns would result in loss of revenue. Either of these results would have negative financial impacts on the company.

IDEM, OAQ has evaluated the information submitted and agrees that the two (2) tire grinding cyclones should be considered an integral part of the tire grinding operation. This determination is based on the fact that the tire grinding dust collection systems have an overwhelming positive net economic effect and are necessary to prevent fires at the grinding units. Therefore, the permitting level will be determined using the potential to emit after controls from the two (2) tire grinding cyclones. Operating conditions in the proposed permit will specify that these two (2) tire grinding cyclones shall operate at all times when the tire grinding units are in operation.

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 – Exemption

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Tire Grinding	2.87	0.29	0.29	0.00	0.00	0.69	0.00	0.17	0.116 (1,1- Dichloroethene)
Rubber Solution Application Pre- Cure	0.00	0.00	0.00	0.00	0.00	5.34	0.00	0.00	
Tire Building Pre- Cure	0.00	0.00	0.00	0.00	0.00	0.004	0.00	0.01	
Curing Pre-Cure	0.00	0.00	0.00	0.00	0.00	1.07	0.00	0.33	
Boiler - Hot Water Heater	0.01	0.05	0.05	0.004	0.63	0.03	0.53	0.01	
Total PTE of Entire Source	2.88	0.33	0.33	0.004	0.63	7.13	0.53	0.52	
Exemptions Levels	5	5	5	10	10	10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX (326 IAC 20-55), are not included in the permit, since this source is not a major source of HAPs, as defined in 40 CFR 63.2.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is 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.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Tire Retreading Operation

- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processing)
The tire retreading operation has potential particulate emissions greater than 0.551 pound per hour. Therefore, the tire retreading operation is subject to 326 IAC 6-3-2.

The allowable particulate emission rate from the tire grinding operation shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

The cyclones shall be in operation at all times the tire grinding processes are in operation, in order to comply with this limit.

- (i) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
The source is located in Wells County, but is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10; and does not have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more, of particulate matter per year. Therefore, the tire retreading operation is exempt from 326 IAC 6.5.
- (j) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
This source is not subject to 326 IAC 8-5-4 because this source is a tire retreading operation and not a rubber tire manufacturing plant.

Compliance Monitoring

- (a) An inspection shall be performed each calendar quarter of each cyclone controlling the grinding operations.
- (b) In the event that a cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emission unit shall be shut down no later than the completion of the processing of the material in the emission line.
- (c) To document compliance, the Permittee shall maintain records of the results of these inspections.

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 July 6, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed Exemption No. 179-28204-00037. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

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

**Appendix A: Emissions Calculations
Summary**

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Pollutants Summary for the Pre-Cure Retread Facility

Potential To Emit (PTE) After Controls*

Pollutant	Tire Grinding (tpy)	Rubber Solution Application Pre-Cure (tpy)	Tire Building Pre-Cure (tpy)	Curing Pre Cure (tpy)	Boiler - Hot Water Heater (tpy)	Totals (tpy)
HAPs Total	0.17	0.00	0.01	0.33	0.01	0.52
Single Highest HAP	1,1-Dichloroethene (1,1-dichloroethylene) (vinylidene chloride)					0.116
Pb	0.003	0.00	0.00	0.00	3.15E-06	0.003
CO	0.00	0.00	0.00	0.00	0.53	0.53
NO _x	0.00	0.00	0.00	0.00	0.63	0.63
SO ₂	0.00	0.00	0.00	0.00	0.004	0.004
PM	2.87	0.00	0.00	0.00	0.01	2.88
PM ₁₀ = PM _{2.5}	0.29	0.00	0.00	0.00	0.05	0.33
VOC	0.69	5.34	0.004	1.07	0.03	7.13

* The cyclones have been determined to be integral to the process. Therefore, PTE is after controls.

Appendix A: Emissions Calculations
Total VOC Emissions Summary for Pre-Cure Retread Facility
Volatile Organic Compounds (VOC) Emissions

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

ID BUF01 and BUF02 VOCs From Tire Grinding

219000 retread tires/yr
x 5.21E-04 lb VOCs/lb rubber ground off (AP42 Table 4.12 Carcass Emission Factors)
x 12.0 lbs/tire rubber ground off
/ 2000 lbs/ton

0.69 tons/yr VOCs
0.156 lbs/hr

ID REP VOCs From Rubber Solution Application & Repair

219000 retread tires/yr
x 25 grams/tire dissolution (based on process studies)
/ 454 grams/lb
x 88.5% VOC content as heptane (88-88.5% VOC)
2000 lbs/ton

5.34 ton/yr VOCs
1.22 lbs/hr

ID TB01 and TB02 VOCs From Extruding Pre-cure Tire Building

219000 retread tires/yr
x 3.3 lbs
x 1.23E-05 lb VOCs/lb rubber (AP42 Table 4.12 Extruding Emission Factors)
/ 2000 lbs/ton

0.004 tons/yr VOCs
0.001 lbs/hr

ID CUR01 and CUR02 VOCs From Pre-cure Curing

219000 retread tires/yr
x 140.7 lbs previously cured rubber in the tire
x 3.10E-04 lbs VOCs/lb rubber cured (AP42 Table 4.12 Curing Emission Factors)
x 20% 80% reduction in emissions due pre-cured rubber
+ 219000 retread tires/yr
x 3.3 lbs uncured rubber/tire
x 3.10E-04 lbs VOCs/lb rubber cured (AP42 Table 4.12 Curing Emission Factors)

2,134.346 lbs VOC/yr
/ 2,000 lbs/ton

1.07 tons VOC/yr
0.244 lbs/hr

Total VOCs Emissions for the Facility	
0.685	ton/yr VOCs for grinding retread tires
5.336	tons/yr total VOCs from rubber dissolution usage
0.004	ton/yr VOCs from extruding pre-cure retread tires
1.067	ton/yr VOCs from curing pre-cure retread tires
7.1	tons/yr total VOCs

Appendix A: Emissions Calculations
Total HAPs Emissions Summary for Pre-cure Retread Facility
Hazardous Air Pollutant (HAP) Emissions

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

ID BUF01 and BUF02 HAPs From Tire Grinding

219000 retread tires/yr
x 1.27E-04 lb HAPs/lb rubber ground off (AP42 Table 4.12 Carcass Emission Factors)
x 12.0 lbs/tire rubber ground off (process study)
/ 2000 lbs/ton

0.166 tons/yr HAPs
0.038 lbs/hr

ID REP HAPs From Rubber Solution Application & Repair

NONE

ID TB01 and TB02 HAPs From Extruding Pre-cure Tire Building

219000 retread tires/yr
x 3.3 lbs
x 3.52E-05 lb HAPs/lb rubber (AP42 Table 4.12 Extruding Emission Factors)
/ 2000 lbs/ton

0.013 tons/yr HAPs for retread tires
0.003 lbs/hr

ID CUR01 and CUR02 HAPs From Pre-cure Curing

219000 retread tires/yr
x 140.7 lbs previously cured rubber in the tire
x 1.06E-04 lbs VOCs/lb rubber cured (AP42 Table 4.12 Curing Emission Factors)
x 20% 80% reduction in emissions due pre-cured rubber
+ 0 retread tires/yr
x 3.3 lbs uncured rubber/tire
x 1.06E-04 lbs VOCs/lb rubber cured (AP42 Table 4.12 Curing Emission Factors)

653.056 lbs VOC/yr
/ 2,000 lbs/ton

0.327 tons VOC/yr
0.075 lbs/hr

Total HAPs Emissions for the Facility
0.166 ton/yr HAPs from grinding retread tires
0.013 ton/yr HAPs from extruding pre-cure retread tires
0.327 ton/yr HAPs from curing pre-cure retread tires
0.51 tons/yr total HAPs

**Appendix A: Emissions Calculations
ID TB Pre-cure Tire Building VOC & HAP Emissions**

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Maximum Capacity: Pre-cure: tires/yr
 Green Rubber Weight: lbs/tire
 Rubber Compounds Extruded: lbs/yr

Analyte Name	CAS #	Cmpd #4 lb/lb rubber	Cmpd #6 lb/lb rubber	Max Emission Factor lb/lb rubber	Extrusion	
					Calculated Emissions lb/yr	Calculated Emissions tons/yr
Total VOC		5.67E-06	1.23E-05	1.23E-05	8.90	0.004
Total Speciated Organics		2.11E-05	9.04E-05	9.04E-05	65.47	0.033
Total Particulate Matter		3.11E-08	7.77E-09	3.11E-08	0.02	1.13E-05
Total Organic HAPs		9.87E-06	3.51E-05	3.51E-05	25.44	0.013
Total Metal HAPs		4.67E-07	1.05E-07	4.67E-07	0.34	1.69E-04
Total HAPs		1.03E-05	3.52E-05	3.52E-05	25.51	0.013
1,1,1-Trichloroethane (methyl chloroform)	71-55-6	8.47E-08	9.37E-08	9.37E-08	0.07	3.39E-05
1,3-Butadiene	106-99-0	8.92E-08	5.06E-07	5.06E-07	0.37	1.83E-04
1,4-Dichlorobenzene	106-46-7	8.36E-09		8.36E-09	0.006	3.03E-06
2-Chloroacetophenone	532-27-4	6.48E-09	1.68E-09	6.48E-09	0.005	2.35E-06
4-Methyl-2-Pentanone	108-10-1	5.54E-06	2.66E-06	5.54E-06	4.011	2.01E-03
Acetonitrile	75-05-8	1.09E-07	2.19E-07	2.19E-07	0.159	7.94E-05
Acetophenone	98-86-2	3.65E-08	3.32E-06	3.32E-06	2.404	1.20E-03
Acrolein	107-02-8	2.03E-07	3.10E-07	3.10E-07	0.225	1.12E-04
Aniline	62-53-3	5.08E-07	2.19E-07	5.08E-07	0.368	1.84E-04
Benzene	71-43-2	4.46E-08	2.69E-07	2.69E-07	0.195	9.74E-05
Biphenyl	92-52-4	4.65E-09	1.68E-08	1.68E-08	0.012	6.09E-06
bis(2-Ethylhexyl)phthalate	117-81-7	1.94E-07	1.13E-07	1.94E-07	0.141	7.04E-05
Carbon Disulfide	75-15-0	1.09E-07	2.66E-07	2.66E-07	0.192	9.62E-05
Chloromethane	74-87-3	7.06E-08	6.64E-08	7.06E-08	0.051	2.56E-05
Chromium (Cr) Compounds¹		2.45E-07	2.25E-08	2.45E-07	0.178	8.88E-05
Cobalt (Co) Compounds		1.90E-08	9.92E-09	1.90E-08	0.014	6.88E-06
Cumene	98-82-8	3.66E-08	1.36E-07	1.36E-07	0.098	4.92E-05
Di-n-butylphthalate	84-74-2	1.87E-07	1.98E-07	1.98E-07	0.143	7.17E-05
Dibenzofuran	132-64-9	3.52E-09	3.24E-09	3.52E-09	0.003	1.28E-06
Dimethylphthalate	131-11-3		4.27E-09	4.27E-09	0.003	1.55E-06
Ethylbenzene	100-41-4	3.30E-08	8.10E-08	8.10E-08	0.059	2.93E-05
Hexane	110-54-3	1.02E-07	3.94E-07	3.94E-07	0.285	1.43E-04
Isooctane	540-84-1	3.81E-08	4.51E-08	4.51E-08	0.033	1.64E-05
Isophorone	78-59-1	3.50E-08		3.50E-08	0.025	1.27E-05
m-Xylene + p-Xylene		7.01E-08	3.32E-07	3.32E-07	0.241	1.20E-04
Methylene Chloride	75-09-2	1.60E-06	1.32E-05	1.32E-05	9.545	4.77E-03
N,N-Diethylaniline	121-69-7	5.45E-09		5.45E-09	0.004	1.97E-06
Naphthalene	91-20-3	1.08E-07	1.98E-07	1.98E-07	0.143	7.17E-05
Nickel (Ni) Compounds		1.99E-07	7.24E-08	1.99E-07	0.144	7.20E-05
o-Toluidine	95-53-4		1.50E-07	1.50E-07	0.108	5.42E-05
o-Xylene	95-47-6	3.49E-08	2.58E-07	2.58E-07	0.187	9.34E-05
Phenol	108-95-2	3.11E-07	1.84E-07	3.11E-07	0.225	1.13E-04
Propylene Oxide	75-56-9		1.75E-06	1.75E-06	1.269	6.35E-04
Styrene	100-42-5	9.61E-09	7.25E-07	7.25E-07	0.525	2.62E-04
Tetrachloroethene (Perchloroethylene)	127-18-4	5.32E-08	4.44E-08	5.32E-08	0.039	1.93E-05
Toluene	108-88-3	1.07E-07	9.26E-06	9.26E-06	6.705	3.35E-03

1. Results are for total chromium. Actual tread was tested for hexavalent chromium. It was not detected.

Methodology Notes:

AP42 Emission Factors for Rubber Manufacturing Industry, Table 4.12 Extruder Emission Factors

**Appendix A: Emissions Calculations
ID CUR Pre -mold Tire Curing VOC & HAP Emissions**

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Maximum Capacity: Pre-cure: tires/yr

Green Rubber Weight: lbs/tire
 previously cured rubber weight
 80% reduction in emissions due to pre-cured rubber

Apportioned Cured Rubber: lbs rubber/yr

Analyte Name	CAS #	Tire A 195/75 lb/lb rubber	Tire B 195/75 lb/lb rubber	Tire C 195/75 lb/lb rubber	Tire D 195/75 lb/lb rubber	Tire E 205/70 lb/lb rubber	Tire F 205/70 lb/lb rubber	Tire G 205/70 lb/lb rubber	Tire H 205/70 lb/lb rubber	Tire I 195/75 lb/lb rubber	Max Emission Factor lb/lb rubber	Curing Calculated Emissions lb/yr	Curing Calculated Emissions tons/yr
Total VOC		3.10E-04	1.94E-04	1.94E-04	3.10E-04	2.11E-04	1.80E-04	2.11E-04	2.11E-04	1.94E-04	3.10E-04	2134.35	1.07
Total Speciated Organics		1.46E-04	1.35E-04	1.35E-04	1.46E-04	2.13E-04	2.04E-04	2.13E-04	2.13E-04	1.35E-04	2.13E-04	1466.50	0.73
Total Organic HAPs		8.53E-05	5.43E-05	5.43E-05	8.53E-05	1.06E-04	8.59E-05	1.06E-04	1.06E-04	5.43E-05	1.06E-04	729.81	0.36
Total HAPs		8.53E-05	5.43E-05	5.43E-05	8.53E-05	1.06E-04	8.59E-05	1.06E-04	1.06E-04	5.43E-05	1.06E-04	729.81	0.36
Acetophenone	98-86-2	1.04E-07	1.20E-07	1.20E-07	1.04E-07	1.07E-07	1.08E-07	1.07E-07	1.07E-07	1.20E-07	1.20E-07	0.826	4.13E-04
Acrolein	107-02-8		1.28E-07	1.28E-07						1.28E-07	1.28E-07	0.881	4.41E-04
Aniline	62-53-3	3.73E-06	3.57E-06	3.57E-06	3.73E-06	5.29E-07	4.36E-06	5.29E-07	5.29E-07	3.57E-06	4.36E-06	29.999	0.01
Benzene	71-43-2	4.78E-07	2.41E-07	2.41E-07	4.78E-07	4.78E-07	3.51E-07	4.78E-07	4.78E-07	2.41E-07	4.78E-07	3.291	1.65E-03
Benzyl Chloride	100-44-7						4.42E-08				4.42E-08	0.304	1.52E-04
Biphenyl	92-52-4	5.41E-08	3.97E-08	3.97E-08	5.41E-08	5.41E-08		5.41E-08	5.41E-08	3.97E-08	5.41E-08	0.372	1.86E-04
bis(2-Ethylhexyl)phthalate	117-81-7	7.00E-09	5.92E-07	5.92E-07	7.00E-09	7.00E-09		7.00E-09	7.00E-09	5.92E-07	5.92E-07	4.076	0.00
Carbon Disulfide	75-15-0	1.32E-05	4.60E-06	4.60E-06	1.32E-05	6.86E-06	4.92E-07	6.86E-06	6.86E-06	4.60E-06	1.32E-05	90.882	0.05
Carbonyl Sulfide	463-58-1	5.44E-07			5.44E-07						5.44E-07	3.745	1.87E-03
2-Chloroacetophenone	532-27-4					1.28E-09		1.28E-09	1.28E-09		1.28E-09	0.009	4.41E-06
Chloroform	67-66-3					2.17E-08		2.17E-08			2.17E-08	0.149	7.47E-05
2-Methylphenol (o-cresol)	95-48-7	5.42E-09	6.63E-09	6.63E-09	5.42E-09	9.00E-09		9.00E-09	9.00E-09	6.63E-09	9.00E-09	0.062	3.10E-05
Chloromethane (methyl chloride)	74-87-3	9.25E-08	4.70E-08	4.70E-08	9.25E-08	6.49E-08	4.92E-08	6.49E-08	6.49E-08	4.70E-08	9.25E-08	0.637	3.18E-04
Cumene	98-82-8	2.28E-07	1.36E-07	1.36E-07	2.28E-07	4.75E-07		4.75E-07	4.75E-07	1.36E-07	4.75E-07	3.270	1.64E-03
Dibenzofuran	132-64-9	9.11E-09	9.81E-09	9.81E-09	9.11E-09	5.84E-09		5.84E-09	5.84E-09	9.81E-09	9.81E-09	0.068	3.38E-05
1,2-Dibromo-3-Chloropropane	96-12-8	2.06E-07			2.06E-07						2.06E-07	1.418	7.09E-04
Di-n-butylphthalate	84-74-2	1.97E-07	4.52E-07	4.52E-07	1.97E-07	2.88E-07	9.49E-07	2.88E-07	2.88E-07	4.52E-07	9.49E-07	6.531	3.27E-03
1,4-Dichlorobenzene	106-46-7	2.49E-09	6.80E-09	6.80E-09	2.49E-09	1.89E-09	6.79E-07	1.89E-09	1.89E-09	6.80E-09	6.79E-07	4.674	2.34E-03
Dimethylphthalate	131-11-3	7.36E-09	2.09E-08	2.09E-08	7.36E-09	9.60E-08	4.06E-09	9.60E-08	9.60E-08	2.09E-08	9.60E-08	0.661	3.30E-04
Ethylbenzene	100-41-4	8.55E-06	3.70E-06	3.70E-06	8.55E-06	1.35E-05	1.03E-05	1.35E-05	1.35E-05	3.70E-06	1.35E-05	92.947	0.05
1,1-Dichloroethane (ethylidene chloride)	75-34-3						7.96E-08				7.96E-08	0.548	2.74E-04
Hexane	110-54-3	6.62E-07	1.58E-06	1.58E-06	8.48E-07	5.97E-06	3.04E-06	5.97E-06	5.97E-06	1.58E-06	5.97E-06	41.103	0.02
Isophorone	78-59-1	4.54E-09	7.62E-09	7.62E-09	4.54E-09	2.06E-08	4.37E-09	2.06E-08	2.06E-08	7.62E-09	2.06E-08	0.142	7.09E-05
Bromomethane (methyl bromide)	74-83-9	9.15E-08			9.15E-08						9.15E-08	0.630	3.15E-04
1,1,1-Trichloroethane (methyl chloroform)	71-55-6	3.96E-08	9.27E-08	9.27E-08	3.96E-08	2.41E-07	1.19E-07	2.41E-07	2.41E-07	9.27E-08	2.41E-07	1.659	8.30E-04
2-Butanone (methyl ethyl ketone)	78-93-3	6.35E-07	5.37E-07	5.37E-07	6.35E-07	1.10E-06	1.55E-06	1.10E-06	1.10E-06	5.37E-07	1.55E-06	10.638	0.01
4-Methyl-2-Pentanone (methyl isobutyl ketone)	108-10-1	1.32E-05	1.26E-05	1.26E-05	1.32E-05	1.29E-05	9.60E-06	1.29E-05	1.29E-05	1.26E-05	1.32E-05	90.882	0.05
t-Butyl Methyl Ether (methyl tert butyl ether)	1634-04-4						3.04E-07				3.04E-07	2.095	1.05E-03
Methylene Chloride	75-09-2	4.21E-06	2.18E-06	2.18E-06	4.21E-06	2.87E-06	5.62E-06	2.87E-06	2.87E-06	2.18E-06	5.62E-06	38.682	0.02
Naphthalene	91-20-3	1.76E-07	1.24E-07	1.24E-07	1.76E-07	2.01E-07		2.01E-07	2.01E-07	1.24E-07	2.01E-07	1.384	6.92E-04
Phenol	108-95-2	3.89E-08	3.87E-07	3.87E-07	3.89E-08	4.64E-07	1.30E-07	4.64E-07	4.64E-07	3.87E-07	4.64E-07	3.195	1.60E-03
Styrene	100-42-5	3.39E-07	4.71E-07	4.71E-07	3.39E-07	6.83E-07	3.98E-06	6.83E-07	6.83E-07	4.71E-07	3.98E-06	27.400	0.01
1,1,2,2-Tetrachloroethane	79-34-5	1.03E-07			1.03E-07						1.03E-07	0.709	3.55E-04
Tetrachloroethane (perchloroethylene)	127-18-4	3.83E-08			3.83E-08	9.56E-08	2.13E-07	9.56E-08	9.56E-08		2.13E-07	1.467	7.33E-04
Toluene	108-88-3	9.47E-06	6.88E-06	6.88E-06	9.47E-06	1.65E-05	1.22E-05	1.65E-05	1.65E-05	6.88E-06	1.65E-05	113.602	0.06
o-Toluidine	95-53-4	9.12E-08	1.01E-07	1.01E-07	9.12E-08	5.45E-08	7.21E-09	5.45E-08	5.45E-08	1.01E-07	1.01E-07	0.695	3.48E-04
1,2,4-Trichlorobenzene	120-82-1		2.59E-09	2.59E-09						2.59E-09	2.59E-09	0.018	8.92E-06
Trichloroethylene	79-01-6		3.68E-08	3.68E-08						3.68E-08	3.68E-08	0.253	1.27E-04
1,1-Dichloroethene (1,1-dichloroethylene) (vinylidene dichloride)	75-35-4						5.85E-07				5.85E-07	4.029	2.01E-03
o-Xylene	95-47-6	6.09E-06	3.06E-06	3.06E-06	6.09E-06	8.74E-06	7.73E-06	8.74E-06	8.74E-06	3.06E-06	8.74E-06	60.175	0.03
m-Xylene + p-Xylene	2.27E-05	1.26E-05	1.26E-05	1.26E-05	2.27E-05	3.36E-05	2.34E-05	3.36E-05	3.36E-05	1.26E-05	3.36E-05	231.336	0.12

Methodology Notes:

Tire A, D and F are original equipment, tires E, G and H are high performance and tires B, C and I are replacement tires.
 1,1,1-Trichloroethane for Tire OEM 205/70 is average from the other tires tested due to suspected mold release presence not normally used.
 AP42 Emission Factors for Rubber Manufacturing Industry, Table 4.12 Tire Cure Emission Factors

**Appendix A: Emissions Calculations
ID BUF - PM From Tire Buffing Operation**

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

PM from Tire Grinding with Interlocked Cyclone Material Handler

219000 retreaded tires/yr ground
x 12 lbs/tire rubber ground off (process study)
/ 2000 lbs/ton
x $5.45E-01$ lbs PM/lb rubber ground off (AP-42)
x 0.4% based on a 99.6 - 99.8% control eff. determined from cyclone stack tests

2.87 ton/yr PM emitted from the grinding of truck tire carcasses after integral cyclones
0.7 lbs/hr

PM₁₀ from Tire Grinding with Interlocked Cyclone Material Handler

219000 retreaded tires/yr ground
x 12 lbs/tire rubber ground off (process study)
/ 2000 lbs/ton
x $5.45E-01$ lbs PM₁₀/lb rubber ground off AP-42
10% PM₁₀
x 0.4% based on a 99.6 - 99.8% control eff. determined from cyclone stack tests

0.29 ton/yr PM₁₀ emitted from the grinding of truck tire carcasses after integral cyclones
0.07 lbs/hr

Assume PM₁₀ = PM_{2.5}

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

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.44

12.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.012	0.048	0.004	0.631	0.035	0.530

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.325E-05	7.569E-06	4.730E-04	1.135E-02	2.144E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.154E-06	6.938E-06	8.830E-06	2.397E-06	1.325E-05

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

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

**Appendix A: Emissions Calculations
ID BUF Tire Grinding VOC & HAP Emissions**

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Truck Tires Ground for Retreading:

219000

 tires/yr

Amount Rubber Ground Off:

12.0

 lbs/tire
 Total Amount Rubber Ground Off:

2,628,000

 lbs/yr

Analyte Name	CAS #	Carcass lb/lb rubber removed	Emissions lbs/year	Emissions tons/year	
Total VOC		5.21E-04	1370	0.69	
Total Organic HAPs		1.27E-04	332.6	0.17	
Total Metal HAPs		6.35E-06	16.7	0.01	
Total HAPs		1.27E-04	332.6	0.17	
Total Particulate Matter		5.45E-01	1432923	716.46	see note 1
1,1,1-Trichloroethane (Methyl	71-55-6	3.58E-07	0.940	4.70E-04	
1,3-Butadiene	106-99-0	2.65E-05	69.546	0.035	
4-Methyl-2-pentanone	108-10-1	1.92E-05	50.361	0.025	
Acetophenone	98-86-2	7.13E-07	1.873	0.001	
Acrolein	107-02-8	1.68E-06	4.427	0.002	
Aniline	62-53-3	1.97E-05	51.863	0.026	
Benzene	71-43-2	4.13E-06	10.842	0.005	
bis(2-Ethylhexyl)Phthalate	117-81-7	7.94E-06	20.876	0.010	
Cadmium (Cd) Compounds		8.58E-07	2.254	0.001	
Carbon Disulfide	75-15-0	2.58E-06	6.770	0.003	
Carbonyl Sulfide	463-58-1	8.70E-06	22.866	0.011	
Chromium (Cr) Compounds		1.44E-06	3.784	0.002	see note 2
Di-n-butylphthalate	84-74-2	2.24E-06	5.893	0.003	
Dibenzofuran	132-64-9	1.59E-07	0.418	2.09E-04	
Hexane	110-54-3	1.60E-05	41.920	0.021	
Isooctane	540-84-1	1.09E-05	28.646	0.014	
Lead (Pb) Compounds		2.02E-06	5.318	0.003	
m-Xylene + p-Xylene		2.23E-06	5.850	0.003	
Methylene Chloride	75-09-2	2.46E-07	0.646	3.23E-04	
Naphthalene	91-20-3	5.81E-07	1.527	0.001	
Nickel (Ni) Compounds		2.03E-06	5.344	0.003	
o-Toluidine	95-53-4	2.55E-06	6.691	0.003	
Phenol	108-95-2	1.66E-06	4.355	0.002	
Toluene	108-88-3	6.27E-06	16.478	0.008	
Trichloroethylene	79-01-6	1.95E-06	5.133	0.003	

Methodology Notes:

- Value is for unrecovered grindings.
- Value represents total chromium. Grindings were analyzed for the presence of hexavalent chromium. Hexavalent chromium was not detected

Additional Notes:

Sidewall, carcass, and belt grinding are reported in pounds emitted per pound of rubber removed or ground-off. AP42 Emission Factors for Rubber Manufacturing Industry, Table 4.12 Grinding Operations, Carcass.

Appendix A: Emissions Calculations
Speciated HAPs Summary for Pre-cure Retreading

Company Name: Snider Tire, Inc.
Address City IN Zip: 1400 W Wiley Ave, Bluffton, IN 46714
Permit Number: 179-28204-00037
Reviewer: Christine L. Filutze
Date: August 17, 2009

Analyte Name	CAS #	Tire Building- Extruding lbs/yr	Curing lbs/yr	Tire Grinding lbs/yr	Total lbs/hr	Total lbs/day	Total lbs/yr	Total tons/yr
Acetonitrile	75-05-8	1.59E-01			0.00002	0.00043	0.159	7.937E-05
Acetophenone	98-86-2	2.40E+00	3.00E+01	1.87E+00	0.00391	0.09391	34.276	0.017
Acrolein	107-02-8	2.25E-01	3.29E+00	4.43E+00	0.00091	0.02176	7.943	0.004
Aniline	62-53-3	3.68E-01	3.04E-01	5.19E+01	0.00600	0.14393	52.535	0.026
Benzene	71-43-2	1.95E-01	3.72E-01	1.08E+01	0.00130	0.03126	11.409	0.006
Benzyl chloride	100-44-7		4.08E+00		0.00047	0.01117	4.076	0.002
Biphenyl	92-52-4	1.22E-02	9.09E+01		0.01038	0.24902	90.894	0.045
Bromomethane (methyl bromide)	74-83-9		1.06E+01		0.00121	0.02914	10.638	0.005
1,3-Butadiene	106-99-0	3.67E-01		6.95E+01	0.00798	0.19154	69.912	0.035
Cadmium compounds				2.25E+00	0.00026	0.00617	2.254	0.001
Carbon disulfide	75-15-0	1.92E-01	8.81E-03	6.77E+00	0.00080	0.01910	6.972	0.003
Carbonyl sulfide	463-58-1		1.49E-01	2.29E+01	0.00263	0.06306	23.015	0.012
2-Chloroacetophenone	532-27-4	4.69E-03	6.20E-02		0.00001	0.00018	0.067	3.33E-05
Chloroform	67-66-3		6.37E-01		0.00007	0.00174	0.637	3.18E-04
Chloromethane (methyl chloride)	74-87-3	5.12E-02	6.75E-02		0.00001	0.00033	0.119	5.94E-05
Chromium Compounds		1.78E-01		3.78E+00	0.00045	0.01085	3.962	0.002
Hexavalent Chromium		not detected		not detected	0.00000	0.00000	0.000	0.000
Cobalt compounds		1.38E-02			0.00000	0.00004	0.014	6.88E-06
Cumene	98-82-8	9.83E-02	1.42E+00		0.00017	0.00416	1.517	0.001
Dibenzofuran	132-64-9	2.55E-03	6.53E+00	4.18E-01	0.00079	0.01905	6.951	0.003
1,2-Dibromo-3-Chloropropane	96-12-8		4.67E+00		0.00053	0.01281	4.674	0.002
Di-n-butylphthalate	84-74-2	1.43E-01	6.61E-01	5.89E+00	0.00076	0.01835	6.698	0.003
1,4-Dichlorobenzene	106-46-7	6.05E-03	9.29E+01		0.01061	0.25467	92.953	0.046
1,1-Dichloroethene (1,1-dichloroethylene)	75-35-4		2.31E+02		0.02641	0.63380	231.336	
(vinylidene chloride)								0.116
1,1-Dichloroethane (ethylidene chloride)	75-34-3		4.11E+01		0.00469	0.11261	41.103	0.021
N,N-Diethylaniline	121-69-7	3.95E-03			0.00000	0.00001	0.004	1.97E-06
Dimethylphthalate	131-11-3	3.10E-03	6.61E-01		0.00008	0.00182	0.664	3.32E-04
Ethylbenzene	100-41-4	5.87E-02	9.29E+01		0.01062	0.25481	93.006	0.047
bis(2-Ethylhexyl)phthalate	117-81-7	1.41E-01	3.75E+00	2.09E+01	0.00283	0.06784	24.762	0.012
Hexachlorobutadiene	87-68-3		1.42E-01		0.00002	0.00039	0.142	7.09E-05
Hexane	110-54-3	2.85E-01	6.30E-01	4.19E+01	0.00489	0.11736	42.835	0.021
Isooctane	540-84-1	3.27E-02	2.86E+01		0.00327	0.07857	28.679	0.014
Isophorone	78-59-1	2.54E-02	1.66E+00		0.00019	0.00462	1.685	0.001
Lead Compounds				5.32E+00	0.00061	0.01457	5.318	0.003
Methylene Chloride (dichloromethane)	75-09-2	9.55E+00	3.19E+00	6.46E-01	0.00153	0.03667	13.386	0.007
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	108-10-1	4.01E+00	3.87E+01	5.04E+01	0.01062	0.25494	93.055	
								0.047
2-Methylphenol (o-cresol)	95-48-7		3.27E+00		0.00037	0.00896	3.270	0.002
3/4-Methylphenol (m-cresol/p-cresol)			5.28E-01		0.00006	0.00145	0.528	2.64E-04
Naphthalene	91-20-3	1.43E-01	2.74E+01	1.53E+00	0.00332	0.07965	29.070	0.015
Nickel Compounds		1.44E-01		5.34E+00	0.00063	0.01504	5.488	0.003
Phenol	108-95-2	2.25E-01	7.09E-01	4.35E+00	0.00060	0.01449	5.289	0.003
Propylene oxide	75-56-9	1.27E+00			0.00014	0.00348	1.269	6.35E-04
Styrene	100-42-5	5.25E-01	1.47E+00		0.00023	0.00546	1.992	9.96E-04
t-Butyl Methyl Ether (methyl tert-butyl ether)	1634-04-4		1.38E+00		0.00016	0.00379	1.384	6.92E-04
1,1,1,2-Tetrachloroethane	79-34-5		1.14E+02		0.01297	0.31124	113.602	0.057
Tetrachloroethene (tetrachloroethylene)	127-18-4	3.85E-02	6.95E-01		0.00008	0.00201	0.734	
(perchloroethylene)								0.000
Toluene	108-88-3	6.70E+00	1.78E-02	1.65E+01	0.00265	0.06356	23.200	0.012
o-Toluidine	95-53-4	1.08E-01	2.53E-01	6.69E+00	0.00081	0.01932	7.053	0.004
1,2,4-Trichlorobenzene	120-82-1		4.03E+00		0.00046	0.01104	4.029	0.002
1,1,1-Trichloroethane (methyl chloroform)	71-55-6	6.79E-02	9.09E+01	9.40E-01	0.01049	0.25175	91.890	0.046
Trichloroethylene (Trichloroethene)	79-01-6		6.02E+01	5.13E+00				0.000
m-Xylene + p-Xylene		2.41E-01	2.01E-01	5.85E+00	0.00072	0.01724	6.292	0.003
o-Xylene	95-47-6	1.87E-01	2.71E-01		0.00005	0.00125	0.457	2.29E-04

Totals: 0.149 3.570 1303.20 0.652
Worst Case: 0.026 0.634 231.34 0.116



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: Timothy J Puck
Snider Tire, Inc
200 E Meadowview Road
Greensboro, NC 47406

DATE: August 24, 2009

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

SUBJECT: Final Decision
Exemption
179-28204-00037

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:
Ginger Ellis, Consultant, Regulatory Strategies
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

Mail Code 61-53

IDEM Staff	DPABST 8/24/2009 Snider Tire, Inc. 179-28204-00037 (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		Timothy J Puck Snider Tire, Inc. 200 E Meadowview Rd Greensboro NC 27406 (Source CAATS) CONFIRM DELIVERY									
2		Mr. Jim Hotopp 4290 South 750 East Bluffton IN 46714 (Affected Party)									
3		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 (Health Department)									
4		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 (Affected Party)									
5		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)									
7		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)									
8		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 (Affected Party)									
9		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 (Affected Party)									
10		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)									
11		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 (Affected Party)									
12		Mr. Neil Potter Southern Wells Community Schools 9120 S 300 W Poneto IN 46781 (Affected Party)									
13		Ginger Ellis Regulatory Strategies 29 Morgans Cove Dr. Isle Of PalmS SC 29451 (Consultant)									
14		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 (Affected Party)									
15		Bluffton City Council and Mayors Office 128 East Market Street Bluffton IN 46714 (Local Official)									

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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											Remarks
1		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 (Local Official)									
2		George R. & Kari L Draper 1540 Western Avenue Bluffton IN 46714 (Affected Party)									
3		James E. & Martha J. Hunter 1345 W. Wiley Avenue Bluffton IN 46714 (Affected Party)									
4		Buckhorn Material Handling Group, Inc. 785 S. Decker St Bluffton IN 46714 (Affected Party)									
5											
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