



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 3, 2012

RE: Press-Seal Gasket Corporation / 003-32125-00360

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Press-Seal Gasket Corporation  
2424 West State Blvd.  
Fort Wayne, Indiana 46808**

(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.: F003-32125-00360	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 3, 2012 Expiration Date: December 3, 2022

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary rubber seal and gasket manufacturing operation.

Source Address:	2424 West State Blvd., Fort Wayne, Indiana 46808
General Source Phone Number:	574-457-0030
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
County Location:	Allen
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)]

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

- (a) One (1) rubber molding operation, identified as EU-1, consisting of five (5) hydraulic injection molding units with five (5) cooling tables, constructed in 2004, with a maximum throughput of 750 pounds of rubber per hour, exhausting to stack 12.
- (b) One (1) extrusion process, identified as EU-2, utilizing two (2) extruders and two (2) Microwave Rubber extruding lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, exhausting to stacks 16 and 17.
- (c) One (1) extrusion process, identified as EU-3, utilizing two (2) extruders and two (2) Salt Bath curing lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, and exhausting to stacks 18, 20, 21, and 22.
- (d) One (1) compression molding operation, identified as EU-4, consisting of three (3) compression molders and one (1) cooling table, constructed in 2004, with a maximum throughput of 105 pounds of rubber per hour, and exhausting to stack 23.
- (e) One (1) adhesive mixing table, identified as EU-5, constructed in 2004 and relocated to the painting booth (EU-6) in 2008, with a maximum throughput of 3.0 pounds of adhesive per hour, and exhausting to stack 24.
- (f) One (1) painting booth, identified as EU-6, utilizing cans of spray paint to apply coating to metal core bits, constructed in 2008, with a maximum throughput of 2.0 pounds of coating per hour (2 cans/hour, each can weighing 1 pound), using cartridge filters for particulate control, exhausting to stack 24.
- (g) One (1) rubber splicing/vulcanizing operation, identified as EU-7, with a total maximum capacity of 970 pounds of rubber per hour, no control, consisting of the following:

- (1) Three (3) hydraulic platen press curing lines, constructed in 1997, 2000, and 2006, with a combined maximum capacity of 660 pounds of rubber per hour, and exhausting to the indoors.
  - (2) Fourteen (14) pneumatic platen press curing tables, constructed in 2004 and 2012, with a combined maximum capacity of 34 pounds of rubber per hour, and exhausting to the indoors.
  - (3) Five (5) manual platen press curing tables, constructed in 2000, with a combined maximum capacity of 276 pounds of rubber per hour, and exhausting to the indoors.
- (h) One (1) ink printing operation, identified as EU-8, consisting of sixteen (16) inkjet printers, constructed in 2002 and 2009, printing ink serial barcodes on rubber gaskets and seals, with a maximum capacity of 0.09 gallons of ink per hour, and exhausting to the indoors.
- (i) One (1) natural-gas fired grieve oven, identified as G-01, constructed in 2004, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and 3750 pounds of rubber per hour, exhausting to stack G-01.

The rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) are considered as one facility.

Note: The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of microwave and salt baths which totals to 3750 lbs/hr.

#### 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) Six (6) natural gas-fired space heaters, identified as SH-1 through SH-6, constructed in 2004, with a total maximum heat input of 1.05 MMBtu per hour, exhausting to stacks SH1 through SH6.
- (b) One (1) natural gas-fired air make-up unit, identified as King Air Make-up, constructed in 2004, with a maximum heat input of 0.6 MMBtu per hour, exhausting to stack K-01.
- (c) Two (2) natural gas-fired ice heaters, identified as IH-1 and IH-2, constructed in 2004, with a total maximum heat input of 0.1 MMBtu per hour, exhausting to stacks IH-1 and IH-2.
- (d) Three (3) natural-gas fired boilers, identified as B-1 through B-3, constructed in 2004, with a total maximum heat input of 0.289 MMBtu per hour, exhausting to stacks B-1 through B-3.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails or other packaging containers with lubricating oils.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, or welding equipment.

- (j) Water based activities, including the following: any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAP, water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAP, noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.
- (k) Closed loop heating and cooling systems.
- (l) Repair activities, including heat exchanger cleaning and repair.
- (m) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).

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) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

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

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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)]

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- (a) This permit, F003-32125-00360, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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- (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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management  
Compliance 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) 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. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 Office of Air Quality, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

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

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- (a) All terms and conditions of permits established prior to F003-32125-00360 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 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]**

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- (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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

B.22 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 no later than 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.23 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), 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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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 5-1-1 (Applicability) and 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]**

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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]**

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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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]**

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- (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 that meets the requirements of 326 IAC 2-8-5(a)(1) 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]**

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- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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]**

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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)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (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.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- 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) 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) rubber molding operation, identified as EU-1, consisting of five (5) hydraulic injection molding units with five (5) cooling tables, constructed in 2004, with a maximum throughput of 750 pounds of rubber per hour, exhausting to stack 12.
- (b) One (1) extrusion process, identified as EU-2, utilizing two (2) extruders and two (2) Microwave Rubber extruding lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, exhausting to stacks 16 and 17.
- (c) One (1) extrusion process, identified as EU-3, utilizing two (2) extruders and two (2) Salt Bath curing lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, and exhausting to stacks 18, 20, 21, and 22.
- (d) One (1) compression molding operation, identified as EU-4, consisting of three (3) compression molders and one (1) cooling table, constructed in 2004, with a maximum throughput of 105 pounds of rubber per hour, and exhausting to stack 23.
- (f) One (1) painting booth, identified as EU-6, utilizing cans of spray paint to apply coating to metal core bits, constructed in 2008, with a maximum throughput of 2.0 pounds of coating per hour (2 cans/hour, each can weighing 1 pound), using cartridge filters for particulate control, exhausting to stack 24.
- (g) One (1) rubber splicing/vulcanizing operation, identified as EU-7, with a total maximum capacity of 970 pounds of rubber per hour, no control, consisting of the following:
  - (1) Three (3) hydraulic platen press curing lines, constructed in 1997, 2000, and 2006, with a combined maximum capacity of 660 pounds of rubber per hour, and exhausting to the indoors.
  - (2) Fourteen (14) pneumatic platen press curing tables, constructed in 2004 and 2012, with a combined maximum capacity of 34 pounds of rubber per hour, and exhausting to the indoors.
  - (3) Five (5) manual platen press curing tables, constructed in 2000, with a combined maximum capacity of 276 pounds of rubber per hour, and exhausting to the indoors.
- (h) One (1) ink printing operation, identified as EU-8, consisting of sixteen (16) inkjet printers, constructed in 2002 and 2009, printing ink serial barcodes on rubber gaskets and seals, with a maximum capacity of 0.09 gallons of ink per hour, and exhausting to the indoors.
- (i) One (1) natural-gas fired grieve oven, identified as G-01, constructed in 2004, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and 3750 pounds of rubber per hour, exhausting to stack G-01.

The rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) are considered as one facility.

Note: The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of microwave and salt baths which totals to 3750 lbs/hr.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) The total combined amount of rubber processed in the rubber extrusion process (EU-2 and EU-3) shall be not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from the rubber extrusion process (EU-2 and EU-3) shall not exceed 0.0000297 pounds per pound of rubber processed.
- (c) The total amount of rubber processed in the hot air curing grievie oven (GO-1) shall be not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The VOC emissions from the hot air curing grievie oven (GO-1) shall not exceed 0.00136 pounds per pound of rubber processed.

Compliance with these limits combined with the unlimited potential to emit VOC from the rubber splicing/vulcanizing operation (EU-7) and ink printing operation (EU-8), shall limit the combined potential to emit VOC from the rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) 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.1.2 Particulate [326 IAC 6-3-2]

In order to render the requirements of 326 IAC 6-3-2(d) not applicable to the painting booth (EU-6), the Permittee shall limit the coatings used in the painting booth (EU-6) to less than five gallons per day.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the painting booth (EU-6) and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.4 VOC Emissions

In order to determine compliance with Condition D.1.1, the Permittee shall use the following equation to determine the tons of VOC emitted per twelve (12) consecutive month period:

- (a) VOC emission calculation
$$VOC = \frac{(V_1 E_E) + (V_2 E_S) + (V_3 E_H) + [(G_1 E_1) + (G_2 E_2)]}{2000 \text{ lbs/ton}}$$

where:

$V_1$  = tons of rubber processed from the rubber extrusion processes (EU2 and EU3) for a 12-month consecutive period

$V_2$  = tons of rubber processed from the splicing/vulcanizing operation (EU-7) for a 12-month consecutive period

$V_3$  = tons of rubber processed from the hot air curing grievie oven (GO-1) for a 12-month consecutive

period

$G_1$  = gallons of ink used since last 12 months

$G_2$  = gallons of makeup solution used since last 12 months

$E_E$  = .0000297 pounds per pound of rubber processed

$E_S$  = 0.000919 pounds per pound of rubber processed

$E_H$  = 0.00136 pounds per pound of rubber processed.

$E_1$  = 5.85468 pounds of VOC per gallon of ink

$E_2$  = 6.60528 pounds of VOC per gallon of makeup solution

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

#### **D.1.5 Record Keeping Requirement**

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- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain monthly records of the amount of rubber processed in the rubber extrusion process (EU-2 and EU-3).
- (b) To document the compliance status with Condition D.1.1(c), the Permittee shall maintain monthly records of the amount of rubber processed in the hot air curing grievie oven (GO-1).
- (c) To document the compliance status with Condition D.1.2, the Permittee shall maintain daily records of the amount of coatings used in the painting booth (EU-6).
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.6 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1(a), D.1.1(c), and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) One (1) adhesive mixing table, identified as EU-5, constructed in 2004 and relocated to the painting booth (EU-6) in 2008, with a maximum throughput of 3.0 pounds of adhesive per hour, and exhausting to stack 24.

(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 [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The input of any single HAP to the adhesives mixing operation (EU-5) shall be less than nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit any single HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and any control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.2.3 HAP [326 IAC 2-1.1-11]

- (a) Compliance with the HAP content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with Condition D.2.1 shall be demonstrated no later than 30 days of the end of each month based on the total HAP-containing material usage for the twelve (12) consecutive month period.

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

#### D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.2.1.
- (1) The HAP content of each coating material and solvent used.
  - (2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) The total single HAP usage for each month; and
  - (4) The total single HAP usage for each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.2.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Insignificant Activities

- (a) Six (6) natural gas-fired space heaters, identified as SH-1 through SH-6, constructed in 2004, with a total maximum heat input of 1.05 MMBtu per hour, exhausting to stacks SH1 through SH6.
- (b) One (1) natural gas-fired air make-up unit, identified as King Air Make-up, constructed in 2004, with a maximum heat input of 0.6 MMBtu per hour, exhausting to stack K-01.
- (c) Two (2) natural gas-fired ice heaters, identified as IH-1 and IH-2, constructed in 2004, with a total maximum heat input of 0.1 MMBtu per hour, exhausting to stacks IH-1 and IH-2.
- (d) Three (3) natural-gas fired boilers, identified as B-1 through B-3, constructed in 2004, with a total maximum heat input of 0.289 MMBtu per hour, exhausting to stacks B-1 through B-3.

(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.3.1 Particulate Emissions [326 IAC 6-2-4]

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Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the three natural-gas fired boilers (identified as B-1 through B-3) shall be limited to 0.6 pounds per MMBtu heat input.

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

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

Source Name: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360

**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: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Rubber Extrusion Process (EU-2 and EU-3)  
Parameter: Rubber Usage  
Limit: The total combined amount of rubber processed in the rubber extrusion process (EU-2 and EU-3) shall be not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Hot Air Curing Grieve Oven (GO-1)  
Parameter: Rubber Usage  
Limit: The total amount of rubber processed in the hot air curing grieve oven (GO-1) shall be not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Adhesives Mixing Table (EU-5)  
Parameter: Single HAP  
Limit: 9.0 tons per twelve (12) month consecutive period, 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			

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Usage Report**  
(Submit Report Quarterly)

Source Name: Press-Seal Gasket Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Painting Booth (EU6)  
Parameter: Coating Usage  
Limit: In order to render the requirements of 326 IAC 6-3-2(d) not applicable to the painting booth (EU-6), the Permittee shall limit the coatings used in the painting booth (EU-6) to less than five gallons per day.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**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: Press-Seal Gasket Corporation  
 Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
 FESOP Permit No.: F003-32125-00360

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Background and Description**

<b>Source Name:</b>	Press-Seal Gasket Corporation
<b>Source Location:</b>	2424 West State Blvd, Fort Wayne, IN 46808
<b>County:</b>	Allen
<b>SIC Code:</b>	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
<b>Permit Renewal No.:</b>	F003-32125-00360
<b>Permit Reviewer:</b>	Diya Bhattacharjee

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Press-Seal Gasket Corporation relating to the operation of an existing stationary rubber seal and gasket manufacturing operation. On July 18, 2012, Press-Seal Gasket Corporation submitted an application to the OAQ requesting to renew its operating permit. Press-Seal Gasket Corporation was issued its FESOP F003-25955-00360 on July 2, 2012.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) rubber molding operation, identified as EU-1, consisting of five (5) hydraulic injection molding units with five (5) cooling tables, constructed in 2004, with a maximum throughput of 750 pounds of rubber per hour, exhausting to stack 12.
- (b) One (1) extrusion process, identified as EU-2, utilizing two (2) extruders and two (2) Microwave Rubber extruding lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, exhausting to stacks 16 and 17.
- (c) One (1) extrusion process, identified as EU-3, utilizing two (2) extruders and two (2) Salt Bath curing lines, constructed in 2004, with a maximum throughput of 1800 pounds of rubber per hour, and exhausting to stacks 18, 20, 21, and 22.
- (d) One (1) compression molding operation, identified as EU-4, consisting of three (3) compression molders and one (1) cooling table, constructed in 2004, with a maximum throughput of 105 pounds of rubber per hour, and exhausting to stack 23.
- (e) One (1) adhesive mixing table, identified as EU-5, constructed in 2004 and relocated to the painting booth (EU-6) in 2008, with a maximum throughput of 3.0 pounds of adhesive per hour, and exhausting to stack 24.
- (f) One (1) painting booth, identified as EU-6, utilizing cans of spray paint to apply coating to metal core bits, constructed in 2008, with a maximum throughput of 2.0 pounds of coating per hour (2 cans/hour, each can weighing 1 pound), using cartridge filters for particulate control, exhausting to stack 24.
- (g) One (1) rubber splicing/vulcanizing operation, identified as EU-7, with a total maximum capacity of 970 pounds of rubber per hour, no control, consisting of the following:

- (1) Three (3) hydraulic platen press curing lines, constructed in 1997, 2000, and 2006, with a combined maximum capacity of 660 pounds of rubber per hour, and exhausting to the indoors.
  - (2) Fourteen (14) pneumatic platen press curing tables, constructed in 2004 and 2012, with a combined maximum capacity of 34 pounds of rubber per hour, and exhausting to the indoors.
  - (3) Five (5) manual platen press curing tables, constructed in 2000, with a combined maximum capacity of 276 pounds of rubber per hour, and exhausting to the indoors.
- (h) One (1) ink printing operation, identified as EU-8, consisting of sixteen (16) inkjet printers, constructed in 2002 and 2009, printing ink serial barcodes on rubber gaskets and seals, with a maximum capacity of 0.09 gallons of ink per hour, and exhausting to the indoors.
  - (i) One (1) natural-gas fired grieve oven, identified as G-01, constructed in 2004, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and 3750 pounds of rubber per hour, exhausting to stack G-01.

The rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) are considered as one facility.

Note: The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of microwave and salt baths which totals to 3750 lbs/hr.

#### Insignificant Activities

This stationary source also includes the following insignificant activities:

- (a) Six (6) natural gas-fired space heaters, identified as SH-1 through SH-6, constructed in 2004, with a total maximum heat input of 1.05 MMBtu per hour, exhausting to stacks SH1 through SH6.
- (b) One (1) natural gas-fired air make-up unit, identified as King Air Make-up, constructed in 2004, with a maximum heat input of 0.6 MMBtu per hour, exhausting to stack K-01.
- (c) Two (2) natural gas-fired ice heaters, identified as IH-1 and IH-2, constructed in 2004, with a total maximum heat input of 0.1 MMBtu per hour, exhausting to stacks IH-1 and IH-2.
- (d) Three (3) natural-gas fired boilers, identified as B-1 through B-3, constructed in 2004, with a total maximum heat input of 0.289 MMBtu per hour, exhausting to stacks B-1 through B-3.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails or other packaging containers with lubricating oils.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, or welding equipment.

- (j) Water based activities, including the following: any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAP, water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAP, noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.
- (k) Closed loop heating and cooling systems.
- (l) Repair activities, including heat exchanger cleaning and repair.
- (m) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).

**Existing Approvals**

Since the issuance of the FESOP No. F003-25955-00360 on July 2, 2008, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Permit Revision No. F003-30887-00360, issued on March 6, 2012.
- (b) Minor Permit Revision No. F003-32035-00360 issued on July 27, 2012.

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

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Allen County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 (NO<sub>x</sub>) 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<sub>x</sub> emissions are

considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM<sub>2.5</sub>

Allen County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Allen County has been classified as attainment or unclassifiable in Indiana for CO, PM<sub>10</sub> and NO<sub>2</sub>. 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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	4.40
PM <sub>10</sub>	4.46
PM <sub>2.5</sub>	4.46
SO <sub>2</sub>	0.01
VOC	47.25
CO	0.90
NO <sub>x</sub>	1.07
GHGs as CO <sub>2</sub> e	1,290
Single HAP	10.75, Toluene
Total HAP	23.29

<b>HAPs</b>	<b>tons/year</b>
Toluene	10.75
Carbon Disulfide	4.27
Tetrachloroethane	1.69
Methanol	1.04
Hexane	0.019
All Other HAPs	5.52
<b>Total</b>	<b>23.29</b>

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered 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 Renewal (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Rubber Molding (EU-1 & EU-4)	0	0	0	0	0	3.44	0	0	2.71	2.00, Carbon Disulfide
Rubber Extrusion (EU-2 & EU-3)**	0.001	0.001	0.001	0	0	24.90	0	0	0.10	0.03, Tetrachloroethane
Rubber Hot Air Curing (G-01)**	0	0	0	0	0		0	0	4.41	1.36, Tetrachloroethane
Rubber Splicing/Vulcanizing (EU-7)**	0	0	0	0	0		0	0	3.07	2.27, Carbon Disulfide
Ink Printing Operation (EU-8)**	0	0	0	0	0		0	0	1.24	1.04, Methanol
Paint Booth (EU-6)	4.38	4.38	4.38	0	0	1.59	0	0	0	0
Adhesives Mixing (EU-5)***	0	0	0	0	0	13.14	0	0	10.75	9.00, Toluene
Natural Gas Combustion	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1,290	0.02	0.019, Hexane
<b>Total PTE of Entire Source</b>	<b>4.40</b>	<b>4.46</b>	<b>4.46</b>	<b>0.01</b>	<b>1.07</b>	<b>43.13</b>	<b>0.90</b>	<b>1,290</b>	<b>22.29</b>	<b>&lt;9.0, Toluene</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO <sub>2</sub> e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO <sub>2</sub> e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	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".

\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

\*\* VOC emissions have been limited to be equal to or less than 24.9 tons per year in order to render the requirements of 326 IAC 8-1-6 not applicable. The rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) are considered as one facility.

\*\*\* Single HAP emissions have been limited to less than 9.0 tons per year in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.

<b>Federal Rule Applicability</b>
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Compliance Assurance Monitoring (CAM)

- (a) 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.

New Source Performance Standards (NSPS)

- (a) The requirements of 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in this permit for the three (3) insignificant natural gas-fired boilers, (identified as B-1 through B-3), constructed in 2004, because they combust natural gas and each have a maximum design heat input capacity of less than 10 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in this permit, since the rubber seal and gasket manufacturing operation does not meet the definition of a publication rotogravure printing press.
- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in this permit, since the inkjet printing operation does not print flexible vinyl or urethane products. The inkjet printing operation prints serial barcodes onto rubber seals and gaskets.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (326 IAC 20-18), are not included in the permit, since the inkjet printing operation does not meet the definition of a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press. In addition, this source is not a major source since the potential to emit any single HAP is limited to less than ten (10) tons per year and the potential to emit of any combination of HAPs is limited to less than twenty-five (25) tons per year.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ (326 IAC 20-65), are not included in the permit, since the inkjet printing operation does not meet the definition of a web coating line. In addition, this source is not a major source since the potential to emit any single HAP is limited to less than ten (10) tons per year and the potential to emit of any combination of HAPs is limited to less than twenty-five (25) tons per year.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products, Subpart MMMM are not included in this permit. This facility does not coat metal substrates. Adhesives are used to bind strips of rubber.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Manufacturing, Subpart XXXX are not included in this permit. This facility manufactures rubber gaskets and sealants for wastewater and sewer industries.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, Subpart HHHHH are not included in this permit. This facility does not manufacture any coatings or adhesives.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the three (3) existing natural gas-fired boilers, because each unit is a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

<b>State Rule Applicability - Entire Source</b>
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326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)  
The source is not subject to 326 IAC 1-5-2.

326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)  
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is less than 250 tons per year, the potential to emit all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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.

326 IAC 2-4.1 (New Source Toxics Control)  
This stationary rubber gasket and seal manufacturing operation is not subject to 326 IAC 2-4.1 (New Source Toxics Control) because these facilities were constructed after July 27, 1997, and have a potential to emit single HAP greater than 10 tons per year, and are not otherwise regulated by a NESHAP.

However, according to emission calculations provided by the Permittee, the single HAP emissions from this operation have actually exceeded 10 tons per year. The Permittee has agreed to continue to limit the single HAP emissions from these operations to less than 10 tons per year in this permit. Compliance with this limit will render the requirements of 326 IAC 2-4.1 not applicable.

326 IAC 2-8 (Federally Enforceable State Operating Permit)  
The potential to emit (as defined in 326 IAC 2-7-1(29)) of single HAP from the adhesives mixing operation is greater than ten (10) tons per year. The source has requested a FESOP Renewal in

order to continue to remain a minor source. The source has agreed to continue to limit the amount of HAP used in the adhesives mixing operation (EU-5) such that the emissions of HAP from the entire source remain below the major source thresholds. The potential to emit PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub> are all less than the 100 tons per year major source threshold.

- (a) The input of any single HAP to the adhesives mixing operation (EU-5) shall be less than nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit any single HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

#### 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 Exemptions), opacity shall meet the following, unless otherwise stated in the 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.

#### 326 IAC 6-4 (Fugitive Dust)

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

#### 326 IAC 6-5 (Fugitive Particulate Matter Limitations)

This source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate matter emissions are negligible.

<b>State Rule Applicability – Individual Facilities</b>
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#### **State Rule Applicability - Rubber Molding**

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

The rubber molding operations, identified as EU-1 and EU-4, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the particulate from these operations is less than 0.551 lbs/hr, each.

##### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The rubber molding operations, identified as EU-1 and EU-4, are not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because these facilities have a potential to emit VOC less than 25 tons per year each.

##### 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The rubber molding operations, identified as EU-1 and EU-4, are not subject to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because they were constructed after January 1, 1980.

##### 326 IAC 8-7-1 (Specific VOC Reduction Requirements)

The rubber molding operations, identified as EU-1 and EU-4, are not subject to 326 IAC 8-7-1 because this facility is not located in Lake, Clark, Floyd, or Porter county.

## State Rule Applicability - Rubber Extrusion, Hot Air Curing, Splicing/Vulcanizing, and Ink Printing

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

The rubber splicing/vulcanizing operation, identified as EU-7, the ink printing operation, identified as EU-8, and the natural-gas fired grieve oven, identified as G-01 are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because they do not have the potential to emit particulate matter.

The extrusion processes, identified as EU-2, EU-3 are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because they are manufacturing processes with potential emissions less than 0.551 pounds per hour.

### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The rubber products that are extruded in lines EU-2 and EU-3 are cured in the microwave extruder, salt baths, hot air curing oven (GO-1), and the splicing/vulcanizing operation (EU-7). In addition, the rubber products that are extruded in lines EU-2 and EU-3 have serial barcodes printed on them in the ink printing operation (EU-8). IDEM has determined that the rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) are one facility. The combined unlimited VOC potential emissions from the rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) is greater than twenty-five (25) tons per year. However, the source shall continue to limit the VOC potential emissions from the rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply. This is an existing requirement.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the rubber extrusion process (EU-2 and EU-3) and the hot air curing oven (GO-1) shall be limited as follows:

- (1) The total combined amount of rubber processed in the rubber extrusion process (EU-2 and EU-3) shall not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) The VOC emissions from the rubber extrusion process (EU-2 and EU-3) shall not exceed 0.0000297 pounds per pound of rubber processed.

#### VOC emissions from the rubber extrusion process (EU-2 and EU-3)

$VOC = (26,900,000 \text{ lbs/year}) * (0.0000297 \text{ lbs/lbs}) * (1/2000 \text{ lbs}) = 0.40 \text{ tons per year}$   
See Appendix A for detailed calculations.

- (3) The total amount of rubber processed in the hot air curing grieve oven (GO-1) shall not exceed 26,900,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (4) The VOC emissions from the hot air curing grieve oven (GO-1) shall not exceed 0.00136 pounds per pound of rubber processed.

#### VOC emissions from the rubber hot air curing grieve oven (GO-1)

$VOC = (26,900,000 \text{ lbs/year}) * (0.00136 \text{ lbs/lbs}) * (1/2000 \text{ lbs}) = 18.29 \text{ tons per year}$   
See Appendix A for detailed calculations.

Compliance with these limits combined with the unlimited potential to emit VOC from the rubber splicing/vulcanizing operation (EU-7) and ink printing operation (EU-8), shall limit the combined potential to emit VOC from the rubber extrusion process (EU-2 and EU-3), rubber

splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) 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.

VOC emissions = Limited VOC emissions from the rubber extrusion process (EU-2 and EU-3)  
+ Limited VOC emissions from the rubber hot air curing oven (GO-1)  
+ Unlimited VOC emissions from Rubber Splicing/Vulcanizing (EU-7)  
+ Unlimited VOC Emissions from INK Printing Operation (EU-8)

$$\begin{aligned} \text{VOC} &= 0.40 \text{ tons/yr} + 18.29 \text{ tons/yr} + 3.90 \text{ tons/yr} + 2.31 \text{ tons/yr} \\ &= 24.90 \text{ tons/yr} \end{aligned}$$

See Appendix A for detailed calculations.

### **State Rule Applicability - Adhesives Mixing**

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

The adhesives mixing operation, identified as EU-5, is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the particulate emissions from this operation is less than 0.551 lbs per hour.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The adhesives mixing operation, identified as EU-5, is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements), because the potential to emit VOC from this operation is less than 25 tons per year.

#### 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The adhesives mixing operation, identified as EU-5, is not subject to 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because it was constructed after January 1, 1980.

#### 326 IAC 8-7-1 (Specific VOC Reduction Requirements)

The adhesives mixing operation, identified as EU-5, is not subject to 326 IAC 8-7-1 because this facility is not located in Lake, Clark, Floyd, or Porter county.

### **State Rule Applicability – Painting Booth (EU-6)**

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

The existing paint booth (EU-6), applies surface coatings in aerosol spray cans. The application of coatings with an aerosol spray nozzle results in the potential to emit particulate matter. The requirements of 326 IAC 6-3-2(d) applies to surface coating operations that are not exempt under the provisions of 326 IAC 6-3-1(5), (6), (7), (8), (12), or (15). The existing paint booth (EU-6) has a potential to use more than five (5) gallons of aerosol applied coatings per day. In order to render the requirements of 326 IAC 6-3-2(d) not applicable, the source has agreed to continue to limit the coatings used in the painting booth (EU-6) to less than five (5) gallons per day. This is an existing requirement.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The paint booth (EU-6) is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because the potential to emit of VOC from this booth does not exceed 25 tons per year.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The Paint Booth (EU-6) is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because even though it has been constructed after July 1, 1990 and applies coating to metal core bits, the actual emissions are not greater than 15 pounds of VOC per day before add-on controls.

### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The insignificant natural gas-fired space heaters, air make-up unit, grieve oven, and ice heaters with heat input equal to or less than ten (10) million Btu per hour are not subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), because these units are not sources of indirect heating.
- (b) The three (3) natural gas-fired boilers, identified as B-1 through B-3, with heat input equal to or less than ten (10) million Btu per hour are subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), because these units are sources of indirect heating located in Allen County which were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from boilers B-1 through B-3 shall be limited to 1.51 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = 0.289 \text{ MMBtu/hr (total source capacity)}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6/MMBtu.

Based on AP-42 emission factors for combustion from natural gas-fired boilers (0.0018 lb/MMBtu), these boilers are able to comply with this limit.

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

The insignificant machining, brazing, cutting, and welding operation is not subject to 326 IAC 6-3 because these manufacturing processes have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour, and are exempt per 326 IAC 6-3-1(b)(14).

#### 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The insignificant natural gas-fired space heaters, air make-up unit, grieve oven, boilers, and ice heaters are not subject to 326 IAC 7-1.1 because its SO<sub>2</sub> PTE (or limited SO<sub>2</sub> PTE) is less than 25 tons/year or 10 pounds/hour.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 or 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5 or 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 18, 2012.

### Conclusion

The operation of this existing stationary rubber seal and gasket manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. F003-32125-00360.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Diya Bhattacharjee 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) 234-5372 or toll free at 1-800-451-6027 extension 5372.
- (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](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
VOC and HAP  
From Adhesives Mixing (EU-5)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

**MAXIMUM POTENTIAL VOC EMISSIONS ASSOCIATED WITH SURFACE COATING - 8,760 HOURS PER YEAR - ADHESIVE**

Material  (EU-5)	Material Usage (Lb/Hr)	Weight% Volatile	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	Potential to Emit VOC (tons/yr)
ADS Polyisoprene Adhesive	3.0	85.0%	2.55	61.2	11.17
Neoprene Adhesive	3.0	87.0%	2.61	62.6	11.43
EPDM Adhesive	3.0	81.8%	2.45	58.9	10.75
<b>Rubber Solvent</b>	<b>3.0</b>	<b>100%</b>	<b>3.00</b>	<b>72.0</b>	<b>13.14</b>
Sponge Adhesive	3.0	79.0%	2.37	56.9	10.38
Nitrile Adhesive	3.0	20.0%	0.60	14.4	2.63
<b>Worst-Case PTE:</b>			<b>3.0</b>	<b>72</b>	<b>13.14</b>

\*There are no particulates from this operation. The transfer efficiency is 100%. All adhesives are applied manually. PTE is based on worst-case coating. Due to the table size, only one adhesive may be applied at a time.

**HAZARDOUS AIR POLLUTANT EMISSIONS - 8,760 HOURS PER YEAR**

MATERIAL  (EU-5)	Material Usage (Lb/Hr)	Weight Percent (%) Toluene	PTE HAP (lb/hr) Toluene	Weight Percent (%) Hexane	PTE HAP (lb/hr) Hexane	Weight Percent (%) Xylene	PTE HAP (lb/hr) Xylene	PTE HAP (ton/yr) Total HAP
ADS Polyisoprene Adhesive	3.0	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Neoprene Adhesive	3.0	79.5%	2.39	0.00%	0.00	0.00%	0.00	10.45
<b>EPDM Adhesive</b>	<b>3.0</b>	<b>81.8%</b>	<b>2.45</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>10.75</b>
Rubber Solvent	3.0	40.0%	1.20	0.00%	0.00	0.00%	0.00	5.26
Sponge Adhesive	3.0	16.0%	0.48	18.0%	0.54	0.00%	0.00	4.47
Nitrile Adhesive	3.0	0.00%	0.00	0.00%	0.00	20.0%	0.60	2.63

**METHODOLOGY**

Potential VOC Pounds per Hour = Maximum Hourly Usage (lb/hr) \* Weight % VOC

Potential VOC Pounds per Day = Maximum Hourly Usage (lb/hr) \* Weight % VOC \* (24 hr/day)

Potential VOC Tons per Year = Maximum Hourly Usage (lb/hr) \* Weight % VOC \* (8760 hr/yr) \* (1 ton/2000 lbs)

Potential HAP Pounds per Hours = Weight Percent HAP (%) x Maximum Hourly Usage (lb/hr)

**Appendix A: Emissions Calculations  
VOC and PM/PM10 Emissions  
From Surface Coating Operations (EU-6)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage* (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 Before Control (tons/year)	Transfer Efficiency**	***Control Efficiency	PTE PM/PM10 After Control (tons/year)
Waterbased Industrial Black Enamel	8.86	18.17%	0.0%	18.17%	0.00%	30.00%	2.00	1.61	1.61	0.36	8.72	1.59	3.58	50.00%	95.0%	0.18
Pro Industrial Acrylic Primer - Gray	10.23	7.82%	0.0%	7.82%	0.00%	37.00%	2.00	0.80	0.80	0.16	3.75	0.69	4.04	50.00%	95.0%	0.20
Pro Industrial 0 VOC Acrylic - Yellow	9.17	0.11%	0.0%	0.11%	0.00%	37.00%	2.00	0.01	0.01	0.002	0.05	0.01	4.38	50.00%	95.0%	0.22
Pro Industrial 0 VOC Acrylic - Ultra Deep Base	8.56	0.00%	0.00%	0.00%	0.00%	33.00%	2.00	0.00	0.00	0.00	0.00	0.00	4.38	50.00%	95.0%	0.22
<b>Worst Case Coating</b>										<b>0.36</b>	<b>8.72</b>	<b>1.59</b>	<b>4.38</b>			<b>0.22</b>

\*Material usage is based on the maximum capacity of 2 cans/hr each with a weight of 1 lb.

There are no HAPs associated with these coatings.

\*\* IDEM has conservatively assumed the aerosol applied coatings will have a transfer efficiency of 50%

\*\*\* The source has claimed the cartridge filters will have a control efficiency of 99.5%. However, IDEM has conservatively assumed a control efficiency of 95%

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

PTE VOC (pounds/hour) = Maximum Usage (lb/hr) \* Weight % Organics

PTE VOC (pounds/day) =Maximum Usage (lb/hr) \* Weight % Organics \* (24 hr/day)

PTE VOC (tons/year) = Maximum Usage (lb/hr) \* Weight % Organics \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE PM/PM10 (tons/year) = Maximum Usage (lb/hr) \* (Weight % Non-Volatiles) \* (1-Transfer efficiency) \*8760 hours/year \*1ton/2000 lbs

**Appendix A: Emissions Calculations  
Rubber and Compression Molding (EU-1 and EU-4)**

**Company Name:** Press-Seal Gasket Corporation  
**Address:** 2424 West State Blvd, Fort Wayne, IN 46808  
**Permit No:** 003-32125-00360  
**Reviewer:** Diya Bhattacharjee

**Unlimited Emissions**

Process	Unlimited Throughput (lbs/hr)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Carbon Disulfide EF (lb/lb Rubber)	Unlimited VOC Emissions (ton/yr)	Unlimited Total HAPs Emissions (ton/yr)	Unlimited Carbon Disulfide Emissions (ton/yr)
Rubber and Compression Molding (EU-1 & EU-4)	855	9.19E-04	7.23E-04	5.35E-04	3.44	2.71	2.00
<b>Total</b>					<b>3.44</b>	<b>2.71</b>	<b>2.00</b>

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput = 750 + 105 = 855 pounds/hour

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Rubber Extrusion (EU-2 and EU-3)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

**Unlimited Emissions**

Process	Unlimited Throughput (lbs/hr)	PM EF (lb/lb Rubber)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Tetrachloro-ethane EF (lb/lb Rubber)	Unlimited PM Emissions (ton/yr)	Unlimited VOC Emissions (ton/yr)	Unlimited Total HAPs Emissions (ton/yr)	Unlimited Tetrachloro-ethane Emissions (ton/yr)
Rubber Extrusion (EU-2 & EU-3)	3,600	4.85E-08	2.97E-05	7.14E-06	2.20E-06	0.0008	0.47	0.11	0.03
<b>Total</b>						<b>0.0008</b>	<b>0.47</b>	<b>0.11</b>	<b>0.03</b>

**Limited Emissions**

Process	Limited Throughput (lbs/yr)	PM EF (lb/lb Rubber)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Tetrachloro-ethane EF (lb/lb Rubber)	Limited PM Emissions (ton/yr)	Limited VOC Emissions (ton/yr)	Limited Total HAPs Emissions (ton/yr)	Limited Tetrachloro-ethane Emissions (ton/yr)
Rubber Extrusion (EU-2 & EU-3)	26,900,000	4.85E-08	2.97E-05	7.14E-06	2.20E-06	0.0007	0.40	0.10	0.03
<b>Total</b>						<b>0.0007</b>	<b>0.40</b>	<b>0.10</b>	<b>0.03</b>

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

Limited Emissions (ton/yr) = Limited Throughput (lb/yr) x EF (lb/lb Rubber) x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Rubber Curing (GO-1)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

**Unlimited Emissions**

Process	Unlimited Throughput (lbs/hr)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Tetrachloroethane EF (lb/lb Rubber)	Unlimited VOC Emissions (ton/yr)	Unlimited Total HAPs Emissions (ton/yr)	Unlimited Tetrachloroethane Emissions (ton/yr)
Hot Air Curing (GO-1)	3750	1.36E-03	3.28E-04	1.01E-04	22.34	5.39	1.66
<b>Total</b>					<b>22.34</b>	<b>5.39</b>	<b>1.66</b>

**Limited Emissions**

Process	Limited Throughput (lbs/yr)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Tetrachloro-ethane EF (lb/lb Rubber)	Limited VOC Emissions (ton/yr)	Limited Total HAPs Emissions (ton/yr)	Limited Tetrachloro-ethane Emissions (ton/yr)
Hot Air Curing (GO-1)	26,900,000	1.36E-03	3.28E-04	1.01E-04	18.29	4.41	1.36
<b>Total</b>					<b>18.29</b>	<b>4.41</b>	<b>1.36</b>

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput (lbs/hr) = The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of microwave and salt baths which totals to 3750 lbs/h

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

Limited Emissions (ton/yr) = Limited Throughput (lb/yr) x EF (lb/lb Rubber) x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Rubber Splicing/Vulcanizing (EU-7)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

**Unlimited Emissions**

Process (EU-7)	Unlimited Throughput (lbs/hr)	VOC EF (lb/lb Rubber)	Total HAPs EF (lb/lb Rubber)	Carbon Disulfide EF (lb/lb Rubber)	Unlimited VOC Emissions (ton/yr)	Unlimited Total HAPs Emissions (ton/yr)	Unlimited Carbon Disulfide Emissions (ton/yr)
Hydraulic platen press	660	9.19E-04	7.23E-04	5.35E-04	2.66	2.09	1.55
Pneumatic platen press	34	9.19E-04	7.23E-04	5.35E-04	0.14	0.11	0.08
Manual platen press	276	9.19E-04	7.23E-04	5.35E-04	1.11	0.87	0.65
<b>Total</b>	970				<b>3.90</b>	<b>3.07</b>	<b>2.27</b>

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput = The summation of the unlimited throughput of the hydraulic platen press, pneumatic platen press and manual platen press

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
VOC and HAP  
From Ink Printing Operations (EU-8)**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

Material	Density (lbs/gal)	Maximum Usage (gal/hr)	VOC Content (%)	Methanol Content (%)	Glycol Ether Content (%)	Potential VOC Emissions (ton/yr)	Potential Methanol Emissions (ton/yr)	Potential Glycol Ether Emissions (ton/yr)	Total HAPs Emissions (ton/yr)
Ink 16-5600	7.506	0.0854	78.00%	35.00%	7.00%	2.19	0.98	0.20	1.18
Makeup Solution 16-2505	6.672	0.004	99.00%	47.00%	3.00%	0.12	0.05	0.004	0.06
<b>Total:</b>						<b>2.31</b>	<b>1.04</b>	<b>0.20</b>	<b>1.24</b>

**Methodology**

Potential Emissions (ton/yr) = Density (lbs/gal) x Maximum Usage (gal/hr) x VOC/HAP Content (%) x 8,760 (hrs/yr) x 1/2,000 (ton/lbs)

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

**Company Name:** Press-Seal Gasket Corporation  
**Address:** 2424 West State Blvd, Fort Wayne, IN 46808  
**Permit No:** 003-32125-00360  
**Reviewer:** Diya Bhattacharjee

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.4

21.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.07	0.06	0.90

\*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.

\*\*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	2.243E-05	1.282E-05	8.012E-04	1.923E-02	3.632E-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	5.341E-06	1.175E-05	1.496E-05	4.059E-06	2.243E-05

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,282	0.0	0.0
Summed Potential Emissions in tons/yr	1,282		
CO2e Total in tons/yr	1,290		

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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.

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations  
Summary of Emissions**

**Company Name: Press-Seal Gasket Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit No: 003-32125-00360  
Reviewer: Diya Bhattacharjee**

Unlimited Potential to Emit (tons/year)											
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Adhesives Mixing (EU-5)	0	0	0	0	0	13.14	0	0	10.75	10.75	Toluene
Paint Booth (EU-6)	4.38	4.38	4.38	0	0	1.59	0	0	0	0	
Rubber Molding (EU-1 & EU-4)	0	0	0	0	0	3.44	0	0	2.71	2.00	Carbon Disulfide
Rubber Extrusion (EU-2 & EU-3)	0.001	0.001	0.001	0	0	0.47	0	0	0.11	0.03	Tetrachloroethane
Rubber Hot Air Curing (G-01)	0	0	0	0	0	22.34	0	0	5.39	1.66	Tetrachloroethane
Rubber Splicing/Vulcanizing (EU-7)	0	0	0	0	0	3.90	0	0	3.07	2.27	Carbon Disulfide
Ink Printing Operation (EU-8)	0	0	0	0	0	2.31	0	0	1.24	1.04	Methanol
Natural Gas Combustion	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1,290	0.02	0.019	Hexane
<b>Total Emissions</b>	<b>4.40</b>	<b>4.46</b>	<b>4.46</b>	<b>0.01</b>	<b>1.07</b>	<b>47.25</b>	<b>0.90</b>	<b>1,290</b>	<b>23.29</b>	<b>10.75</b>	<b>Toluene</b>

Limited Potential to Emit (tons/year)											
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Adhesives Mixing (EU-5)*	0	0	0	0	0	13.14	0	0	10.75	9.00	Toluene
Paint Booth (EU-6)	4.38	4.38	4.38	0	0	1.59	0	0	0.0	0	
Rubber Molding (EU-1 & EU-4)	0	0	0	0	0	3.44	0	0	2.71	2.00	Carbon Disulfide
Rubber Extrusion (EU-2 & EU-3)**	0.001	0.001	0.001	0	0	24.90	0	0	0.10	0.03	Tetrachloroethane
Rubber Hot Air Curing (G-01)**	0	0	0	0	0		0	0	4.41	1.36	Tetrachloroethane
Rubber Splicing/Vulcanizing (EU-7)**	0	0	0	0	0		0	0	3.07	2.27	Carbon Disulfide
Ink Printing Operation (EU-8)**	0	0	0	0	0		0	0	1.24	1.04	Methanol
Natural Gas Combustion	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1,290	0.02	0.019	Hexane
<b>Total Emissions</b>	<b>4.40</b>	<b>4.46</b>	<b>4.46</b>	<b>0.01</b>	<b>1.07</b>	<b>43.13</b>	<b>0.90</b>	<b>1,290</b>	<b>22.29</b>	<b>9.00</b>	<b>Toluene</b>

\* Single HAP emissions have been limited to less than 9.0 tons per year in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

\*\* VOC emissions have been limited to be equal to or less than 24.9 tons per year in order to render the requirements of 326 IAC 8-1-6 not applicable.



# 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](http://www.idem.IN.gov)

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

**TO:** Dan Keller  
Press-Seal Gasket Corporation  
2424 W State Blvd  
Fort Wayne, IN 46808

**DATE:** December 3, 2012

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

**SUBJECT:** Final Decision  
FESOP Renewal  
003-32125-00360

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:  
Jason Kaczymarczyk – VP Operations  
Jason Morrison – Concentra Environmental Health and Safety Services  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# 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  
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[www.idem.IN.gov](http://www.idem.IN.gov)

December 3, 2012

TO: Allen County Public Library

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

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

**Applicant Name: Press-Seal Gasket Corporation**  
**Permit Number: 003-32125-00360**

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	GHOTOPP 12/3/2012 Press-Seal Gasket Corp 003-32125-00360 final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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7		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
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10		Mr. Jason Morrison Concentra Environmental Health and Safety Services 10339 Dawsons Creek Blvd suite 7E Fort Wayne IN 46825 (Consultant)										
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