INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: October 9, 2013

RE: Griffith Rubber Mills / 033-32971-00081

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.dot 6/13/13

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Michael R. Pence
Governor

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Commissioner

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Griffith Rubber Mills
507 N. Lee Street
Garrett, Indiana 46738

(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.: F033-32971-00081	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 9, 2013 Expiration Date: October 9, 2023

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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)]

The Permittee owns and operates a stationary custom molded rubber products manufacturing company.

Source Address:	507 N. Lee Street, Garrett, Indiana 46738
General Source Phone Number:	260-357-0876
SIC Code:	3061
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) Rubber Extrusion Process, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3 (part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of rubber components per hour. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

(b) One (1) Rubber Curing Process, consisting of the following units, constructed in 2001:

(1) Two (2) autoclaves with a combined maximum throughput rate of 1,997 pounds of rubber components per hour.

(2) One (1) hot air oven cure (part of microwave line), with a maximum throughput rate of 1,305 pounds of rubber components per hour. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2.

(c) One (1) rubber molding operation (identified as EU-006) consisting of twelve (12) self-contained hydraulic molding presses and thirty-four (34) air presses (25 SMACCO, 5 JO Mory, 3 Conway and 1 Gluco), with a combined maximum throughput of 213 pounds of rubber components per hour; and exhausting inside the building. Seven (7) hydraulic molding presses and twenty-three air presses were constructed in 2001, and an additional eight (8) SMACCO, three (3) Conway air presses and one hydraulic air press were constructed in 2009. Three (3) air presses were approved for construction in 2013.

(d) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:

(1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour, constructed in 1999, and exhausting at stack B2. [326 IAC 6-2-4]

(2) Four (4) Modine Heaters, with total maximum heat input capacity of 0.55 MMBtu/hr.

(3) Six (6) Reznor Heaters, with total maximum heat input capacity of 1.79 MMBtu/hr.

(4) One (1) Space Ray Heater, with maximum heat input capacity of 0.05 MMBtu/hr.

(5) One (1) Rheem Heater, with maximum heat input capacity of 0.09 MMBtu/hr.

(b) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

(c) Combustion source flame safety purging on startup.

(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) The following equipment related to manufacturing activities and hand-held equipment not resulting in the emissions of HAPS: brazing equipment, soldering equipment, welding, cutting (excluding cutting torches), machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding.

(i) Closed loop heating and cooling systems.

(j) Forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) Filter or coalescer media changeout.

(o) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 0 Celsius).

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]

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

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

(a) This permit, F033-32971-00081, 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]

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]

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)]

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)]

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)]

(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, or Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**.**

(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]

(a) All terms and conditions of permits established prior to F033-32971-00081 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)]

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]

(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)]

(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]

(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]

(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. [326 IAC 2-8-10(b)(3)]

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 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_2 equivalent emissions (CO_2e) 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]

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

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

The Permittee shall not operate an incinerator 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]

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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]

(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]

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

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

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

Unless otherwise specified in this permit, 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)]

(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. The analog instrument shall be capable of measuring values outside of the normal range.

(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]

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]

(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, where applicable:

(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, where applicable:

(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]

(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

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:

(b) One (1) Rubber Curing Process, consisting of the following units, constructed in 2001:

(1) Two (2) autoclaves with a combined maximum throughput rate of 1,997 pounds of rubber components per hour.

(2) One (1) hot air oven cure (part of microwave line), with a maximum throughput rate of 1,305 pounds of rubber components per hour. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2.

(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 Federally Enforceable State Operating Permit (FESOP) [326 IAC 2-8][326 IAC 8-1-6] [326 IAC 2-4.1]

The Permittee shall comply with the following:

(a) VOC emissions from each of the autoclaves, when processing Sulfur Cure (EPDM 1), shall not exceed 0.00615 pounds of VOC per pound of rubber processed.

(b) Carbon disulfide emissions from each of the autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed 0.00593 pounds of carbon disulfide per pound of rubber processed.

(c) The total amount of rubber processed in the two (2) autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed two million eight hundred-fifty thousand (2,850,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Carbon disulfide emissions from the Hot Air Cure, when producing Sulfur Cure (EPDM 1), shall not exceed 0.000643 pounds of carbon disulfide per pound of rubber processed.

(e) The amount of rubber processed in the Hot Air Cure, when producing Sulfur Cure (EPDM 1), shall not exceed one million (1,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the limits under (a) and (c) above, shall limit the total VOC emissions from the two (2) autoclaves to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-7 (Part 70 permits) not applicable.

Compliance with the limits under (b), (c), (d), and (e) above, shall limit the source-wide total potential to emit of any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the facilities listed above and their control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.3 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken on monthly basis and shall be complete and sufficient to establish compliance with the VOC and HAP emission limitations established in Condition D.1.1.

(1) The type and amount of rubber processed in the autoclave curing process each month and each compliance period.

(2) The type and amount of rubber processed in the Hot Air Oven curing process each month and 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.1.4 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, 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 reports submitted by the Permittee 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:

(1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour, constructed in 1999, and exhausting at stack B2. [326 IAC 6-2-4]

(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 Particulate [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the Continental boiler with a 4.55 MMBtu per hour heat input shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

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

Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
FESOP Permit No.: F033-32971-00081

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: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
FESOP Permit No.: F033-32971-00081

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
FESOP Permit No.: F033-32971-00081
Facility: Two (2) autoclaves
Parameter: The total amount of rubber processed in the two (2) autoclaves, when producing Sulfur Cure (EPDM 1)
Limit: The total amount of rubber processed in the two (2) autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed two million eight hundred-fifty thousand (2,850,000) 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: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
FESOP Permit No.: F033-32971-00081
Facility: Hot Air Cure
Parameter: The amount of rubber processed in the Hot Air Cure, when producing Sulfur Cure (EPDM 1)
Limit: The amount of rubber processed in the Hot Air Cure, when producing Sulfur Cure (EPDM 1), shall not exceed one million (1,000,000) 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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
FESOP Permit No.: F033-32971-00081

Months: _____ to _____ Year: _____

Page 1 of 2

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name:	Griffith Rubber Mills
Source Location:	507 N. Lee Street, Garrett, IN 46738
County:	Dekalb
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
Permit Renewal No.:	F033-32971-00081
Permit Reviewer:	Heath Hartley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Griffith Rubber Mills relating to the operation of a custom molded rubber products manufacturing company. On March 19, 2013, Griffith Rubber Mills submitted an application to the OAQ requesting to renew its operating permit. Griffith Rubber Mills was issued its first FESOP F033-26072-00081 on January 14, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) Rubber Extrusion Process, utilizing three (3) rubber extruding lines (identified as extruder 1, 2 and 3 (part of the microwave line)) with a combined maximum throughput rate of 2,995 pounds of rubber components per hour. Extruder 3 was installed in 1996, while extruder 1 and 2 were installed in 2001.

(b) One (1) Rubber Curing Process, consisting of the following units, constructed in 2001:

(1) Two (2) autoclaves with a combined maximum throughput rate of 1,997 pounds of rubber components per hour.

(2) One (1) hot air oven cure (part of microwave line), with a maximum throughput rate of 1,305 pounds of rubber components per hour. The hot air oven cure exhausts at roof exhaust fans identified as MW1 and MW2.

(c) One (1) rubber molding operation (identified as EU-006) consisting of twelve (12) self-contained hydraulic molding presses and thirty-four (34) air presses (25 SMACCO, 5 JO Mory, 3 Conway and 1 Gluco), with a combined maximum throughput of 213 pounds of rubber components per hour; and exhausting inside the building. Seven (7) hydraulic molding presses and twenty-three air presses were constructed in 2001, and an additional eight (8) SMACCO, three (3) Conway air presses and one hydraulic air press were constructed in 2009. Three (3) air presses were approved for construction in 2013.

(d) One (1) splicing operation cleaning small rubber parts by dipping in toluene, with a maximum throughput rate of 0.17 gallon of toluene per hour. This unit was constructed in 2001.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including:

(1) One (1) Continental boiler, burning natural gas, with a maximum heat input capacity of 4.55 MMBtu per hour, constructed in 1999, and exhausting at stack B2. [326 IAC 6-2-4]

(2) Four (4) Modine Heaters, with total maximum heat input capacity of 0.55 MMBtu/hr.

(3) Six (6) Reznor Heaters, with total maximum heat input capacity of 1.79 MMBtu/hr.

(4) One (1) Space Ray Heater, with maximum heat input capacity of 0.05 MMBtu/hr.

(5) One (1) Rheem Heater, with maximum heat input capacity of 0.09 MMBtu/hr.

(b) One (1) ink-jet printing operation, with a maximum throughput rate of 0.04 gallons of ink and solvent per hour. This unit was constructed in 1998.

(c) Combustion source flame safety purging on startup.

(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) The following equipment related to manufacturing activities and hand-held equipment not resulting in the emissions of HAPS: brazing equipment, soldering equipment, welding, cutting (excluding cutting torches), machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding.

(i) Closed loop heating and cooling systems.

(j) Forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) Filter or coalescer media changeout.

(o) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 0 Celsius).

Existing Approvals

Since the issuance of the FESOP (F033-26072-00081) on January 14, 2009, the source has constructed or has been operating under the following additional approvals:

(a) Administrative Amendment No. 033-28620-00081, issued on December 10, 2009; and
(b) Administrative Amendment No. 033-31064-00081,issued on December 7, 2011.

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.

The following changes have been made:

- PTE calculations were revised to better reflect emissions from each individual emission unit, based on processing of worst case rubber recipe.
- Record keeping and reporting were changed to match permit FESOP limits.

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 Dekalb County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

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

(b) $PM_{2.5}$
Dekalb County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$, SO_2, and NOx 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
Dekalb County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM_{10}, $PM_{2.5}$, NO_2, and Pb. 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	0.06
PM10	0.23
PM2.5	0.23
SO2	0
NOx	3.08
VOC	84.3
CO	2.59
GHGs as CO2e	3,717
Total HAP	65.6
Highest Single HAP	56.5 (Carbon Disulfide)

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 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.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year.

(c) 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_2 equivalent emissions (CO_2e) per year.

PTE of the Entire Source After Issuance of the FESOP

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_{10} (1)	$PM_{2.5}$ (2)	SO_2	NO_x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Extrusion	1.2E-4	1.2E-4	1.2E-4	0	0	1.07	0	0	0.39	0.20 Carbon Disulfide
Curing - Autoclaves	0	0	0	0	0	22.5 (3)	0	0	8.61 (4)	8.45 (4) Carbon Disulfide
Curing - Hot Air Oven	0	0	0	0	0	21.4	0	0	5.94 (4)	0.32 (4) Carbon Disulfide
Presses	0	0	0	0	0	1.34	0	0	1.02	0.81 Carbon Disulfide
Splicing	0	0	0	0	0	5.38	0	0	5.38	5.38 Toluene
Ink Printing	0	0	0	0	0	1.17	0	0	0	0
Nat Gas Combustion	0.06	0.23	0.23	0	3.08	0.17	2.59	3,717	0.06	0.10 Hexane
Total PTE of Entire Source	**0.06**	**0.23**	**0.23**	**0**	**3.08**	**53.0**	**2.59**	**3,717**	**21.4**	**9.78 Carbon Disulfide**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
(2) $PM_{2.5}$ listed is direct $PM_{2.5}$.
(3) VOC emissions are limited to render 326 IAC 8-1-6 not applicable.
(4) HAP emissions are limited to render 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_2 equivalent emissions (CO_2e) per year, and it is not in one of the twenty-eight (28) listed source categories.

The Permittee shall comply with the following:

(a) VOC emissions from each of the autoclaves, when processing Sulfur Cure (EPDM 1), shall not exceed 0.00615 pounds of VOC per pound of rubber processed.

(b) Carbon disulfide emissions from each of the autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed 0.00593 pounds of carbon disulfide per pound of rubber processed.

(c) The total amount of rubber processed in the two (2) autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed two million eight hundred-fifty thousand (2,850,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Carbon disulfide emissions from the Hot Air Cure, when producing Sulfur Cure (EPDM 1), shall not exceed 0.000643 pounds of carbon disulfide per pound of rubber processed.

(e) The amount of rubber processed in the Hot Air Cure, when producing Sulfur Cure (EPDM 1), shall not exceed one million (1,000,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the limits under (a) and (c) above, shall limit the total VOC emissions from the two (2) autoclaves to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-7 (Part 70 permits) not applicable.

Compliance with the limits under (b), (c), (d), and (e) above, shall limit the source-wide total potential to emit of any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Federal Rule Applicability

(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.

(b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included for the Continental boiler because it has a heat input capacity of less than ten (10) MMBtu per hour.

(c) The petroleum storage tanks at this source are not subject to the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) (326 IAC 12) because all storage tanks have a storage capacity of less than or equal to 75 cubic meters (m^3) (19812.9 gallons)

(d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.

(e) The requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Rubber Tire Manufacturing (326 IAC 14) are not included for this modification because the Permittee does not manufacture tires. The Permittee manufactures custom molded rubber products used for trucks, cars, air conditioners, farming equipment, school buses, etc.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.

(g) 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 Continental boiler because it is a gas-fired boiler.

(h) 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 natural-gas fired heaters because process heaters and hot water heaters are not subject to this rule.

(i) 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.

State Rule Applicability - Entire Source

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-6 (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.

(d) 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

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

(f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to 326 IAC 6-5, because the source does not have a potential fugitive particulate matter emission of twenty-five (25) tons per year or more.

(g) 326 IAC 6.5 (PM Limitations Except Lake County)
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

(h) 326 IAC 6.8 (PM Limitations for Lake County)
This source is not subject to 326 IAC 6.5 because it is not located in Lake County.

(i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

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

State Rule Applicability – Individual Facilities

(a) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of Renewal of the FESOP Section above.

(b) 326 IAC 6-2-4 (Particulate Matter)
Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the Continental boiler with a 4.55 MMBtu per hour heat input shall be limited to 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

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

Q = Total source maximum operating capacity rating in million Btu per hour heat input (14.1 MMBtu per hour)

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

(1) Pursuant to 326 IAC 6-3-1(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the provisions of 326 IAC 6-3. Potential emissions from the rubber extruding lines are less than 0.551 pound per hour, therefore the rubber extruding lines are exempt from 326 IAC 6-3.

(2) Pursuant to 326 IAC 6-3-1(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the provisions of 326 IAC 6-3. Potential emissions from the brazing equipment, soldering equipment, , machining and turning (wood, metal, or plastic), buffing, carving, drilling, grinding, polishing, routing, sanding, sawing, and surface grinding are less than 0.551 pound per hour. Therefore, these processes are exempt from 326 IAC 6-3.

(3) Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3, because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.

(4) Pursuant to 326 IAC 6-3-1(b)(10), the cutting operations are exempt from the requirements of 326 IAC 6-3, because the maximum capacity of each torch cutting station is less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

(d) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The emission units at this source are not subject to 326 IAC 326 IAC 7-1.1, because the potential to emit SO_2 for each unit is less than 25 tons/year and 10 pounds/hour, respectively.

(e) 326 IAC 8-1-6 (Volatile Organic Compounds (VOC))
The unlimited potential to emit of VOC from the two (2) autoclaves is greater than 25 tons per year. In order to render the requirements of 326 IAC 8-1-6 not applicable, the potential VOC emissions from the two (2) autoclaves shall be limited to less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

The Permittee shall comply with the following:

(1) VOC emissions from each of the autoclaves, when processing Sulfur Cure (EPDM 1), shall not exceed 0.00615 pounds of VOC per pound of rubber processed.

(2) The total amount of rubber processed in the two (2) autoclaves, when producing Sulfur Cure (EPDM 1), shall not exceed two million eight hundred-fifty thousand (2,850,000) pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, shall limit the total VOC emissions from the two (2) autoclaves to less than 25 tons per 12 consecutive month period, and shall render 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) not applicable.

No emission units are subject to 326 IAC 8-1-6 since they all have PTE less than twenty-five (25) tons of VOC per year.

(f) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
The petroleum storage tanks at this source are not subject to 326 IAC 8-4-3 because these tanks have capacities less than 39,000 gallons.

(g) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
This facility does not manufacture rubber tires. Therefore, 326 IAC 8-5-4 is not applicable.

(h) There are no 326 IAC 8 Rules that are applicable to the emission units at this source.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 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 2-8-4. 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.

There is no applicable compliance determination or compliance monitoring applicable to this source.

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 March 19, 2013.

Conclusion

The operation of this custom molded rubber products manufacturing company shall be subject to the conditions of the attached FESOP Renewal No. F033-32971-00081.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations
Emissions Summary

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Potential To Emit (PTE) Before Controls - tons per year (tpy)

Emission Source	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Single HAP	
Extrusion	1.2E-04	1.2E-04	1.2E-04	0	0	1.07	0	0	0.39	0.20	Carbon Disulfide
Curing - Autoclaves	0	0	0	0	0	53.8	0	0	52.83	51.87	Carbon Disulfide
Curing - Hot Air Oven	0	0	0	0	0	21.4	0	0	5.94	3.68	Carbon Disulfide
Presses	0	0	0	0	0	1.34	0	0	1.02	0.81	Carbon Disulfide
Splicing	0	0	0	0	0	5.38	0	0	5.38	5.38	Toluene
Ink Printing	0	0	0	0	0	1.17	0	0	0	0	
Nat Gas Combustion	0.06	0.23	0.23	0	3.08	0.17	2.59	3,717	0.06	0.10	Hexane
Totals	**0.06**	**0.23**	**0.23**	**0**	**3.08**	**84.3**	**2.59**	**3,717**	**65.6**	**56.5**	Carbon Disulfide

Limited PTE - tons per year (tpy)

Emission Source	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Single HAP	
Extrusion	1.2E-04	1.2E-04	1.2E-04	0	0	1.1	0	0	0.39	0.20	Carbon Disulfide
Curing - Autoclaves	0	0	0	0	0	22.5	0	0	8.61	8.45	Carbon Disulfide
Curing - Hot Air Oven	0	0	0	0	0	21.4	0	0	5.94	0.32	Carbon Disulfide
Presses	0	0	0	0	0	1.34	0	0	1.02	0.81	Carbon Disulfide
Splicing	0	0	0	0	0	5.38	0	0	5.38	5.38	Toluene
Ink Printing	0	0	0	0	0	1.17	0	0	0	0	
Nat Gas Combustion	0.06	0.23	0.23	0	3.08	0.17	2.59	3,717	0.06	0.10	Hexane
Totals	**0.06**	**0.23**	**0.23**	**0**	**3.08**	**53.0**	**2.59**	**3,717**	**21.4**	**9.78**	Carbon Disulfide

Notes:
1. For emission units (extrusion, autoclaves, hot air oven cure and presses) they can only process one rubber recipe at a time. Therefore worst case recipe is used to determine PTE.
2. For all other units not listed here, the PTE is assumed to be negligible.

Appendix A: Emission Calculations
HAPs Emissions Summary - PTE

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

HAPs Potential To Emit (PTE) Before Controls - tons per year (tpy)

HAP	Extrusion	Autoclave	Hot Air Cure	Presses
Benzene	0.00	0.18	0.28	0
Hexane	0.01	0	0.04	0.03
Toluene	0.01	0.14	0.06	0.02
Carbon Disulfide	**0.20**	**51.87**	**3.68**	**0.81**
Carbonyl Sulfide	0.16	0.36	0.00	0.41
o-Xylene	0.00	0.16	1.59	0
Methylene Chloride	0.02	0.25	0.24	0.00
m,p-Xylene	0.00	0.12	0.00	0
Acrilonitrile	0.08	1.74	1.65	0.03
Propylene Oxide	0.05	1.03	0.98	0.03
1,3 Butadiene	0	0	0.05	0.02
2-Butanone	0	0	0.00	0.01
Acetophenone	0	0	1.22	0.00
Neoprene	0	0	0	0

HAPs - Limited PTE - tons per year (tpy)

HAP	Extrusion	Autoclave	Hot Air Cure	Presses
Benzene	0.00	0.03	0.02	0.00
Hexane	0.01	0.00	0.04	0.03
Toluene	0.01	0.02	0.06	0.02
Carbon Disulfide	**0.20**	**8.45**	**0.32**	**0.81**
Carbonyl Sulfide	0.16	0.06	0.00	0.41
o-Xylene	0.00	0.16	1.59	0.00
Methylene Chloride	0.02	0.25	0.24	0.00
m,p-Xylene	0.00	0.02	0.00	0.00
Acrilonitrile	0.08	1.74	1.65	0.03
Propylene Oxide	0.05	1.03	0.98	0.03
1,3 Butadiene	0.00	0.00	0.05	0.02
2-Butanone	0.00	0.00	0.00	0.01
Acetophenone	0.00	0.00	1.22	0.00
Neoprene	0	0	0	0

HAPs summary includes worst case recipe HAPs for each emission unit.

Appendix A: Emission Calculations
EPDM 1 (Sulfur Cure)

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Rubber Compound # 8

			PTE (Tons/Year)						
EPDM (Sulfur Cure)	Maximum Lbs Processed/hr	VOC EF (lb/lb)	VOC PTE (ton/yr)	HAPs EF (lb/lb)	Combined HAPs (ton/yr)	EF for PM	PM	PM10	PM2.5
Extrusion	2,995	3.95E-05	0.52	2.99E-05	0.39	2.67E-08	4.00E-08	4.00E-08	4.00E-08
Two (2) Autoclaves	1,997	0.00615	53.79	0.00604	52.83				
Hot Air Cure	1,305	0.0019	10.86	9.76E-04	5.58				
Presses	213	0.00144	1.34	0.00109	1.02				

			Limited PTE		
Limited VOC and HAPs	lb processed/yr	VOC EF (lb/lb)	VOC PTE (ton/yr)	HAPs EF (lb/lb)	Combined HAPs (ton/yr)
Two (2) Autoclaves LIMITED	2,850,000	0.00615	8.76	6.04E-03	8.61
Hot Air Cure LIMITED	1,000,000	0.0019	0.95	9.76E-04	0.49

Speciated HAP's

Extrusion	Carbon Disulfide		Carbonyl Sulfide		Toluene		Methylene Chloride		Hexane		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	1.50E-05	0.20	1.20E-05	0.16	7.05E-07	0.01	2.58E-07	0.00	6.84E-07	0.01	0.38
Two (2) Autoclaves	Carbon Disulfide		Carbonyl Sulfide		Toluene		m,p-Xylene		Benzene		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	5.93E-03	51.87	4.17E-05	0.36	1.59E-05	0.14	1.34E-05	0.12	2.07E-05	0.18	52.67
Hot Air Cure	Carbon Disulfide		o-Xylene		Toluene		Benzene		Acetophenone		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	6.43E-04	3.68	4.92E-05	0.28	4.37E-06	0.02	4.88E-05	0.28	2.13E-04	1.22	5.48
Presses	Carbon Disulfide		Carbonyl Sulfide		Toluene		Hexane		2-Butanone		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	5.48E-04	0.51	4.39E-04	0.41	2.57E-05	0.02	2.50E-05	0.02	9.92E-06	0.01	0.98

Totals (ton/yr)	Carbon Disulfide	56.25	Carbonyl Sulfide	0.93	Toluene	0.20	Methylene Chloride	0.003	Hexachloroethane	0.009
			o-Xylene	0.28			m,p-Xylene	0.12	Acetophenone	1.22
							Benzene	0.46	2-Butanone	0.009
							Hexane	0.023		

Speciated HAP's LIMITED

Two (2) Autoclaves LIMITED	Carbon Disulfide		Carbonyl Sulfide		Toluene		m,p-Xylene		Benzene	
	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr
	5.93E-03	8.45	4.17E-05	0.06	1.59E-05	0.02	1.34E-05	0.02	2.07E-05	0.03
Hot Air Cure LIMITED	Carbon Disulfide		o-Xylene		Toluene		Benzene		Acetophenone	
	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr	EF (lb/lb)	ton/yr
	6.43E-04	0.32	4.92E-05	0.02	4.37E-06	0.00	4.88E-05	0.02	2.13E-04	0.11

Methodology

Extrusion Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-62
Autoclave and Hot Air Cure Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products (11/08)
Presses Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-97
Uncontrolled/Unlimited PTE (ton/yr) = Max Capacity (lb/hr) x Emission Factor (lb/lb) x 8760 hr/yr x 1 ton/2000 lb
Limited Emissions (ton/yr) = Limited throughput (lb/yr) x Emission Factor (lb/lb) x 1 ton/2000 lb

Appendix A: Emission Calculations
Paracryl BLT (NBR)

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Rubber Compound # 14

			PTE (Tons/Year)							
Paracryl BLT (NBR)	Maximum Lbs Processed/hr	VOC EF (lb/lb)	VOC PTE (ton/yr)	HAPs EF (lb/lb)	Combined HAPs (ton/yr)	PM EF	PM	PM10	PM2.5
Extrusion	2,995	8.14E-05	1.07	2.27E-05	0.30	1.57E-08	2.35E-08	2.35E-08	2.35E-08
Autoclave	1,997	0.00257	22.48	7.16E-04	6.26				
Hot Air Cure	1,305	0.00374	21.38	0.00104	5.94				
Presses	213	0.00133	1.24	0.00103	0.96				

Speciated HAP's

Extrusion	Carbon Disulfide		Carbonyl Sulfide		Acrilonitrile		Methylene Chloride		Propylene Oxide		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	2.28E-06	0.03	6.06E-06	0.08	6.29E-06	0.08	8.99E-07	0.01	3.73E-06	0.05	0.25
Autoclave	Carbon Disulfide		Carbonyl Sulfide		Acrilonitrile		Methylene Chloride		Propylene Oxide		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	7.20E-05	0.63	1.91E-04	1.67	1.99E-04	1.74	2.84E-05	0.25	1.18E-04	1.03	5.32
Hot Air Cure	Carbon Disulfide		o-Xylene		Acrilonitrile		Methylene Chloride		Propylene Oxide		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	1.05E-04	0.60	2.79E-04	1.59	2.89E-04	1.65	4.13E-05	0.24	1.72E-04	0.98	5.07
Presses	Carbon Disulfide		Carbonyl Sulfide		Acrilonitrile		Hexane		1,3 Butadiene		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	8.67E-04	0.81	8.80E-05	0.08	3.02E-05	0.03	6.50E-06	0.01	2.17E-05	0.02	0.95

Methodology

Extrusion Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-67
Autoclave Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-122
Hot Air Cure Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-142
Presses Emission Factors (EF) from AP 42 Chapter 4, section 12 Emission Factors Tables (11/08)
Uncontrolled/Unlimited PTE (ton/yr) = Max Capacity (lb/hr) x Emission Factor (lb/lb) x 8760 hr/yr x 1 ton/2000 lb
Limited Emissions (ton/yr) = Limited throughput (lb/yr) x Emission Factor (lb/lb) x 1 ton/2000 lb

Appendix A: Emission Calculations
Neoprene (CRW)

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Rubber Compound # 11

Neoprene (CRW)	Maximum Lbs Processed/hr	VOC EF (lb/lb)	VOC PTE (ton/yr)	HAPs EF (lb/lb)	HAPs PTE (ton/yr)	PM EF (lb/lb)	Tons PM	Tons PM10	Tons PM2.5
Extrusion	2,995	1.89E-05	0.25	6.12E-06	0.080	9.45E-09	1.24E-04	1.24E-04	1.24E-04
Autoclave	1,997	4.87E-04	4.26	3.18E-04	2.782				
Hot Air Cure	1,305	8.67E-04	4.96	2.81E-04	1.606				
Presses	213	7.31E-04	0.68	6.68E-04	0.623				

Extrusion	Carbon Disulfide		Hexane		Toluene		Methylene Chloride		1,3 Butadiene		sum
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	4.63E-06	0.06	1.52E-07	0.00	2.10E-07	0.00	2.68E-07	0.00	2.05E-07	0.00	0.072
Autoclave	Carbon Disulfide		Carbonyl Sulfide		Toluene		Benzene		o-Xylene		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	2.68E-04	2.34	3.98E-06	0.03	5.11E-06	0.04	1.64E-06	0.01	1.78E-05	0.16	2.594
Hot Air Cure	Carbon Disulfide		Hexane		Toluene		Methylene Chloride		1,3 Butadiene		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	2.13E-04	1.22	6.99E-06	0.04	9.65E-06	0.06	1.23E-05	0.07	9.41E-06	0.05	1.437
Presses	Carbon Disulfide		Hexane		Toluene		Methylene Chloride		Propylene Oxide		
	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	EF (lb/lb)	Tons/yr	
	3.47E-04	0.32	3.12E-05	0.03	2.30E-06	0.00	2.83E-06	0.00	3.63E-05	0.03	0.391

Methodology

Extrusion Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-62
Hot Air Cure Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-137
Autoclave and Presses Emission Factors (EF) from AP 42 Chapter 4, section 12 - Manufacture of Rubber Products (11/08)
Uncontrolled/Unlimited PTE (ton/yr) = Max Capacity (lb/hr) x Emission Factor (lb/lb) x 8760 hr/yr x 1 ton/2000 lb
Limited Emissions (ton/yr) = Limited throughput (lb/yr) x Emission Factor (lb/lb) x 1 ton/2000 lb

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

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Emission Source	Heat Input Capacity (MMBtu/Hr)
Boiler - Continental	4.55
Modine Heaters (3)	0.55
Reznor Heaters (3)	1.79
Space Ray Heater	0.05
Rheem Heater	0.09
Total	**7.03**

MMBtu/hr	mmBtu / mmscf	MMCF/yr
7.03	1000	61.58

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.06	0.23	0.23	0.02	3.08	0.17	2.59

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics					
	Benzene	Dichlorobenze	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	0.000065	0.000037	0.002309	0.055425	0.000105	0.0579

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	0.000015	0.000034	0.000043	0.000012	0.000065	0.0002

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

	Total	**0.06**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,695	0.1	0.1
Summed Potential Emissions in tons/yr	3,695		
CO2e Total in tons/yr	3,717		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
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: Emission Calculations
Toluene Splicing (HAP) & Ink Printing

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

Splicing Operation

0.17	Max Throughput (gal/hr)
0.866	Specific gravity toluene
8.34	Specific gravity of water
7.22	Density Toluene (lb/gal)
5.4	Toluene PTE (ton/yr)

Methodology
PTE (ton/yr) = Max Throughput (gal/hr) x Density (lb/gal) x 8760 hr/yr x 1 ton/2000 lb

Ink Printing

0.04	Max Throughput (gal/hr)
6.70	Density MEK (lb/gal)
1.17	VOC PTE (ton/yr)

Methodology
PTE (ton/yr) = Max Throughput (gal/hr) x Density (lb/gal) x 8760 hr/yr x 1 ton/2000 lb

Appendix A: Emission Calculations
PTE of new Presses

Company Name: Griffith Rubber Mills
Source Address: 507 N. Lee Street, Garrett, Indiana 46738
Permit Number: F033-32971-00081
Reviewer: Heath Hartley

New Presses

	Maximum Capacity (lbs processed/hr)	EF (lb/lb)	VOC PTE (ton/yr)	HAPs EF (lb/lb)	HAPs PTE (ton/yr)
EPDM	13	0.00144	0.082	0.00109	0.062
Paracryl BLT (NBR)	13	0.00133	0.076	0.00103	0.059
Neoprene (CRW)	13	7.31E-04	0.042	6.68E-04	0.038
Worst Case			**0.20**		**0.16**

Methodology
Presses Emission Factors (EF) from 'Emission Factor Background Report for AP 42 Section 4.12 - Manufacture of Rubber Products' 4.12-97
Uncontrolled/Unlimited PTE (ton/yr) = Max Capacity (lb/hr) x Emission Factor (lb/lb) x 8760 hr/yr x 1 ton/2000 lb

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Max Gregory Jr.
Griffith Rubber Mills
507 N Lee Street
Garrett, In 46738

DATE: October 9, 2013

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

SUBJECT: Final Decision
FESOP Renewal
033-32971-00081

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 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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 9, 2013

TO: Garrett Public Library

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

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

Applicant Name: Griffith Rubber Mills
Permit Number: 033-32971-00081

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 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 10/9/2013 Griffith Rubber Mills 033-32971-00081 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Max Gregory Jr Griffith Rubber Mills 507 N Lee St Garrett IN 46738 (Source CAATS) via confirmed delivery									
2		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
3		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 *(Local Official)*									
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 *(Affected Party)*									
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 *(Affected Party)*									
6		Dekalb County Health Department 220 E 7th St #110 Auburn IN 46706 *(Health Department)*									
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 *(Affected Party)*									
8		Garrett Public Library 107 W Houston Garrett IN 46738-1494 *(Library)*									
9		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 *(Affected Party)*									
10		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 *(Affected Party)*									
11		Mr. Jason Morrison Concentra Environmental Health and Safety Services 10339 Dawsons Creek Blvd suite 7E Fort Wayne IN 46825 *(Consultant)*									
12											
13											
14											
15											

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