



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for Sperry & Rice Manufacturing Company, LLC in Franklin County

Permit No. F047-33679-00012

The Indiana Department of Environmental Management (IDEM) has received an application from Sperry & Rice Manufacturing Company, LLC located at 9146 U.S. 52, Brookville, IN 47012 for a renewal of its FESOP issued on July 6, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Sperry & Rice Manufacturing Company, LLC to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

Brookville Public Library
919 Main Street
Brookville, IN 47012

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, Indiana 47220-9557

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit



application, please contact IDEM at the address below. Please refer to permit number F047-33679-00012 in all correspondence.

Comments should be sent to:

Sarah Street
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 2-8427
Or dial directly: (317) 232-8427
Fax: (317)-232-6749 attn: Sarah Street
E-mail: ssstreet@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 (and IDEM Southeast Regional Office, 820 West Sweet Street, Brownstown, Indiana 47220-9557).

If you have any questions please contact Sarah Street or my staff at the above address.


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Sperry & Rice Manufacturing Company, LLC
9146 U.S. 52
Brookville, Indiana 47012**

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

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

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

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

Operation Permit No.: F047-33679-00012	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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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 rubber products manufacturing plant.

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

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

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

- (a) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW3.
- (b) One (1) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), constructed in 2009, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack IDs: SMW 9.
- (c) One (1) 4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8), constructed in 1989, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #8, with a maximum capacity of 514 pounds of rubber per hour, utilizing no control, and exhausting to six (6) stacks (Stack IDs: SMW1, SMW2, SMW4-SMW7).
- (d) Two (2) hot and two (2) cold feed rubber extruders, identified as REXT1 through REXT4, constructed in 1968, each with a maximum capacity of 490 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SREXT.
- (e) One (1) rubber autoclave, identified as AC1, constructed in 1968, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC1.
- (f) One (1) rubber autoclave, identified as AC2, constructed in 1969, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC2.

- (g) One (1) Banbury mixer/mill, identified as BBM, constructed in the 1960s, mixing rubber compound #8, with a maximum capacity of 1,250 pounds per hour, and exhausting to Stack ID: SDCBBM and using the following control device:
 - (1) One (1) multi-compartment baghouse for particulate control with an outlet grain loading of less than 0.03 grains per standard cubic feet and less than 4,000 cubic feet per minute.

Note: Rubber compound #10 is not processed in the 4 1/2 inch continuous vulcanization line (EXTMW2 (AC8)), extruders (REXT1 through REXT4), autoclaves (AC1 and AC2), or Banbury mixer/mill (BBM).

- (h) Soapstone dusting operations, identified as DUST, constructed in the 1960s, with a maximum capacity of 5.5 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW8.
- (i) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR1, constructed prior to September 21, 1983, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR1.
- (j) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR2, constructed in 1979, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR2.
- (k) One (1) Mohawk natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR3, constructed in 1979, rated at 6.30 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR3.
- (l) One (1) Whirl Power natural gas-fired boiler, with No. 2 fuel oil as a back-up fuel, identified as BLR4, constructed in 1979, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR4.

Note: These natural gas-fired boilers burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing.

- (m) One (1) No. 2 fuel oil storage tank, identified as FOST, with a maximum storage capacity of 10,000 gallons.
- (n) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

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

This stationary source also includes the following insignificant activities:

- (a) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (1) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents; and
 - (2) Brazing, soldering, or welding operations and associated equipment.

- (b) Water based activities, including the following:
 - (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (c) Water related activities, including the following:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process;
 - (2) Steam traps, vents, leaks, and safety relief valves;
 - (3) Laundry operations using only water solutions of bleach or detergents;
 - (4) Boiler water treatment operations, not including cooling towers; and
 - (5) Oxygen scavenging (deaeration) of water.
- (d) Activities related to ventilation, venting equipment, and refrigeration, including the following:
 - (1) Ventilation exhausts, central chiller water systems, refrigeration, and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;
 - (2) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste; and
 - (3) Air vents from air compressors.
- (e) Activities performed using hand-held equipment, including the following:
 - (1) Cutting, excluding cutting torches;
 - (2) Drilling;
 - (3) Grinding;
 - (4) Machining wood, metal, or plastic; and
 - (5) Sawing.
- (f) Housekeeping and janitorial activities and supplies, including the following:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
 - (2) Steam cleaning activities;
 - (3) Rest rooms and associated cleanup operations and supplies; and
 - (4) Mobile floor sweepers and floor scrubbers.
- (g) Office related activities, including the following:
 - (1) Office supplies and equipment;
 - (2) Photocopying equipment and associated supplies;
 - (3) Paper shredding; and
 - (4) Blueprint machines, photographic equipment, and associated supplies.
- (h) Storage equipment and activities, including the following:
 - (1) Pressurized storage tanks and associated piping for Liquid Petroleum Gas (LPG);
 - (2) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
 - (3) Storage of drums containing maintenance raw materials; and

- (4) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed, except when the material is added or removed.
- (i) Activities generating limited amounts of fugitive dust, including the following:
 - (1) Road salting and sanding.
- (j) Activities associated with production, including the following:
 - (1) Air compressors and pneumatically operated equipment, including hand tools.
- (k) One (1) warm-up mill, identified as WUM, constructed in 1960, with a maximum capacity of 1,250 pounds per hour, and exhausting fugitively.

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, F047-33679-00012, 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 Southeast 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
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 F047-33679-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

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

B.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 CO₂ equivalent emissions (CO₂e) 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)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

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:

- (a) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW3.
 - (b) One (1) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), constructed in 2009, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack IDs: SMW 9.
 - (c) One (1) 4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8), constructed in 1989, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #8, with a maximum capacity of 514 pounds of rubber per hour, utilizing no control, and exhausting to six (6) stacks (Stack IDs: SMW1, SMW2, SMW4-SMW7).
 - (d) Two (2) hot and two (2) cold feed rubber extruders, identified as REXT1 through REXT4, constructed in 1968, each with a maximum capacity of 490 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SREXT.
 - (e) One (1) rubber autoclave, identified as AC1, constructed in 1968, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC1.
 - (f) One (1) rubber autoclave, identified as AC2, constructed in 1969, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC2.
 - (g) One (1) Banbury mixer/mill, identified as BBM, constructed in the 1960s, mixing rubber compound #8, with a maximum capacity of 1,250 pounds per hour, and exhausting to Stack ID: SDCBBM and using the following control device:
 - (1) One (1) multi-compartment baghouse for particulate control with an outlet grain loading of less than 0.03 grains per standard cubic feet and less than 4,000 cubic feet per minute.
- Note: Rubber compound #10 is not processed in the 4 1/2 inch continuous vulcanization line (EXTMW2 (AC8)), extruders (REXT1 through REXT4), autoclaves (AC1 and AC2), or Banbury mixer/mill (BBM).
- (h) Soapstone dusting operations, identified as DUST, constructed in the 1960s, with a maximum capacity of 5.5 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW8.

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

Pursuant to 326 IAC 2-8-4 (FESOP) and, the combined worst-case single HAP emissions (carbon disulfide) from the two (2) 3 1/2 inch vulcanized lines (EXTMW1 (AC7) and EXTMW3 (AC9), the

two (2) hot and two (2) cold feed rubber extruders (REXT1 through REXT4), and the two (2) rubber autoclave (AC1 and AC2) shall not exceed 8.10 tons per twelve (12) month consecutive period.

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

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

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

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC emissions from the one (1) 3 1/2 inch vulcanized line EXTMW3 (AC9), shall not exceed 24.97 tons per twelve (12) month consecutive period.

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, is required for these units. Section B- Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with 326 IAC 2-8-4 and to ensure exemption from the requirements of 326 IAC 6-3-2, the baghouse for particulate control shall be in operation at all times whenever the Banbury mixer/mill, identified as BBM, is in operation.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4] [326 IAC 2-8]

- (a) Compliance with the VOC emission limits in Conditions D.1.2(a), and D.1.3 for each of the two (2) 3 1/2 inch vulcanization lines (EXTMW1 (AC7) and EXTMW3 (AC9) shall be determined by the following equation, with compliance determined at the end of each month:

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

Where,

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

m = Total Number of Months in Period.

- (b) Compliance with the VOC emission limit in Condition D.1.2(b) for the 3 1/2 inch vulcanization line (EXTMW1 (AC7)) shall be determined by the following equation, with compliance determined at the end of each month:

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

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

- (1) Hot air curing operations:
- (i) using #10 compound: 0.0163 pounds of VOC per pound of rubber utilized;
 - (ii) using #14 compound: 0.0129 pounds of VOC per pound of rubber utilized;
 - (iii) using #13 compound: 0.0128 pounds of VOC per pound of rubber utilized;
 - (iv) using #3 compound: 0.00762 pounds of VOC per pound of rubber utilized;
 - (v) using #22 compound: 0.00294 pounds of VOC per pound of rubber utilized;
 - (vi) using #11 compound: 0.00184 pounds of VOC per pound of rubber utilized;
 - (vii) using #9 compound: 0.00163 pounds of VOC per pound of rubber utilized;
 - (viii) using #8 compound: 0.000825 pounds of VOC per pound of rubber utilized; and
- (2) Mixing operations: 0.000291 pounds of VOC per pound of rubber utilized; and
- (3) Milling operations: 0.000425 pounds of VOC per pound of rubber utilized; and
- (4) Extruding operations: 0.0000697 pounds of VOC per pound of rubber utilized; or
- (5) Other IDEM, OAQ approved emission factor(s).

- (c) Compliance with the VOC emission limit in Condition D.1.3 for the 3 1/2 inch vulcanized line EXTMW3 (AC9) shall be determined by using the most recent emission factors in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

D.1.7 Worst-Case Single Hazardous Air Pollutants (HAP) [326 IAC 2-8]

Compliance with the worst-cast single HAP emission limit in Condition D.1.1 for each of the two (2) 3 1/2 inch vulcanization lines (EXTMW1 (AC7) and EXTMW3 (AC9), the two (2) hot and two (2) cold feed rubber extruders (REXT1 through REXT4), and the two (2) rubber autoclave (AC1 and AC2), shall be determined by the following equation, with compliance determined at the end of each month:

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

Where,

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

m = Total Number of Months in Period.

The Permittee shall use the most recent emission factors in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
 - (1) The monthly throughputs of each type of rubber compound utilized for each of the two (2) 3 1/2 inch continuous vulcanization lines (EXTMW1 (AC7), EXTMW3 (AC9), the two (2) hot and two (2) cold feed rubber extruders (REXT1 through REXT4), and the two (2) rubber autoclave (AC1 and AC2) :
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) Calendar dates covered in the compliance determination period.
 - (3) The total VOC and worst-case single HAP emissions for each month calculated based on the equations in Conditions D.1.6 and D.1.7.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that 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:

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

Note: These natural gas-fired boilers burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing.

(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 6-2-3]

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

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

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

Source Name: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012

This form consists of 2 pages

Page 1 of 2

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012
Facility: EXTMW1 (AC7)
Parameter: VOC
Limit: shall not exceed 25 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

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

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

☐ 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: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012
Facility: EXTMW3 (AC9)
Parameter: VOC
Limit: shall not exceed 24.97 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

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

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

Emission factors to use should be the most recent version in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012
Facility: EXTMW1 (AC7), EXTMW3 (AC9), REXT1 through REXT4, AC1, and AC2
Parameter: Carbon Disulfide
Limit: shall not exceed 8.10 tons/yr, with compliance determined at the end of each month

YEAR: _____

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

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

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

Emission factors to use should be the most recent version in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sperry & Rice Manufacturing Company, LLC
Source Address: 9146 U.S. 52, Brookville, Indiana 47012
FESOP Permit No.: F047-33679-00012

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: Source Location: County: SIC Code: Permit Renewal No.: Permit Reviewer:	Sperry & Rice Manufacturing Company, LLC 9146 U.S. 52, Brookville, IN 47012 Franklin 3061 (Molded, Extruded and Lathe-Cut Mechanical Rubber Goods) F047-33679-00012 Sarah Street
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The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Sperry & Rice Manufacturing Company, LLC relating to the operation of a stationary rubber products manufacturing plant. On September 20, 2013, Sperry & Rice Manufacturing Company, LLC submitted an application to the OAQ requesting to renew its operating permit. Sperry & Rice Manufacturing Company, LLC was issued FESOP No. F047-27727-00012 on July 6, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) 3 1/2 inch continuous vulcanization line, identified as EXTMW1 (AC7), constructed in 1999, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW3.
- (b) One (1) 3 1/2 inch continuous vulcanization lines, identified as EXTMW3 (AC9), constructed in 2009, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #10, with a maximum capacity of 476 pounds of rubber per hour, utilizing no control, and exhausting to Stack IDs: SMW 9.
- (c) One (1) 4 1/2 inch continuous vulcanization line, identified as EXTMW2 (AC8), constructed in 1989, consisting of hot air curing, mixing, milling and extrusion, utilizing the worst-case VOC and HAP emitting rubber compound #8, with a maximum capacity of 514 pounds of rubber per hour, utilizing no control, and exhausting to six (6) stacks (Stack IDs: SMW1, SMW2, SMW4-SMW7).
- (d) Two (2) hot and two (2) cold feed rubber extruders, identified as REXT1 through REXT4, constructed in 1968, each with a maximum capacity of 490 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SREXT.
- (e) One (1) rubber autoclave, identified as AC1, constructed in 1968, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC1.
- (f) One (1) rubber autoclave, identified as AC2, constructed in 1969, with a maximum capacity of 37.50 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SAC2.
- (g) One (1) Banbury mixer/mill, identified as BBM, constructed in the 1960s, mixing rubber compound #8, with a maximum capacity of 1,250 pounds per hour, and exhausting to Stack ID: SDCBBM and using the following control device:

- (1) One (1) multi-compartment baghouse for particulate control with an outlet grain loading of less than 0.03 grains per standard cubic feet and less than 4,000 cubic feet per minute.

Note: Rubber compound #10 is not processed in the 4 1/2 inch continuous vulcanization line (EXTMW2 (AC8)), extruders (REXT1 through REXT4), autoclaves (AC1 and AC2), or Banbury mixer/mill (BBM).

- (h) Soapstone dusting operations, identified as DUST, constructed in the 1960s, with a maximum capacity of 5.5 pounds of rubber per hour, utilizing no control, and exhausting to Stack ID: SMW8.
- (i) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR1, constructed prior to September 21, 1983, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR1.
- (j) One (1) Iron Fireman natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR2, constructed in 1979, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR2.
- (k) One (1) Mohawk natural gas-fired boiler with No. 2 fuel oil as a back-up fuel, identified as BLR3, constructed in 1979, rated at 6.30 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR3.
- (l) One (1) Whirl Power natural gas-fired boiler, with No. 2 fuel oil as a back-up fuel, identified as BLR4, constructed in 1979, rated at 4.20 MMBtu/hr, utilizing no control, and exhausting to Stack ID: SBLR4.

Note: These natural gas-fired boilers burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing.

- (m) One (1) No. 2 fuel oil storage tank, identified as FOST, with a maximum storage capacity of 10,000 gallons.
- (n) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Activities related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including the following:
 - (1) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents; and
 - (2) Brazing, soldering, or welding operations and associated equipment.
- (b) Water based activities, including the following:
 - (1) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (c) Water related activities, including the following:

- (1) Production of hot water for on-site personal use not related to any industrial or production process;
 - (2) Steam traps, vents, leaks, and safety relief valves;
 - (3) Laundry operations using only water solutions of bleach or detergents;
 - (4) Boiler water treatment operations, not including cooling towers; and
 - (5) Oxygen scavenging (deaeration) of water.
- (d) Activities related to ventilation, venting equipment, and refrigeration, including the following:
 - (1) Ventilation exhausts, central chiller water systems, refrigeration, and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;
 - (2) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste; and
 - (3) Air vents from air compressors.
- (e) Activities performed using hand-held equipment, including the following:
 - (1) Cutting, excluding cutting torches;
 - (2) Drilling;
 - (3) Grinding;
 - (4) Machining wood, metal, or plastic; and
 - (5) Sawing.
- (f) Housekeeping and janitorial activities and supplies, including the following:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
 - (2) Steam cleaning activities;
 - (3) Rest rooms and associated cleanup operations and supplies; and
 - (4) Mobile floor sweepers and floor scrubbers.
- (g) Office related activities, including the following:
 - (1) Office supplies and equipment;
 - (2) Photocopying equipment and associated supplies;
 - (3) Paper shredding; and
 - (4) Blueprint machines, photographic equipment, and associated supplies.
- (h) Storage equipment and activities, including the following:
 - (1) Pressurized storage tanks and associated piping for Liquid Petroleum Gas (LPG);
 - (2) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
 - (3) Storage of drums containing maintenance raw materials; and
 - (4) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed, except when the material is added or removed.
- (i) Activities generating limited amounts of fugitive dust, including the following:
 - (1) Road salting and sanding.

- (j) Activities associated with production, including the following:
- (1) Air compressors and pneumatically operated equipment, including hand tools.
- (k) One (1) warm-up mill, identified as WUM, constructed in 1960, with a maximum capacity of 1,250 pounds per hour, and exhausting fugitively.

Note: There are no new emission units with this renewal. There are also no emission units being removed with this renewal.

Existing Approvals

Since the issuance of FESOP No. F047-27727-00012 on July 6, 2009, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 047-31384-00012 issued on February 21, 2013.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12. According to the background document for AP-42, Volume I, Fifth Edition, Chapter 4, Section 12, all emissions factors are E rated. Each emissions factor has a rating of E (poor), since the majority of test results represent averages of just 3 runs (one total gaseous emissions series relies on 4 runs) for just one compound or process.

County Attainment Status

The source is located in Franklin County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
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. Franklin County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Franklin County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. 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}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Franklin County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	5.60
PM ₁₀	5.78
PM _{2.5}	5.33
SO ₂	9.28
NO _x	14.19
VOC	73.88
CO	6.82
GHGs as CO ₂ e	12,763
Single HAP	15.28 (Carbon Disulfide)
Total HAP	18.68

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

- ### Potential to Emit After Issuance

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Banburry Mixer/Mill (BBM)	1.22	1.22	1.22	0.00	0.00	0.20	0.00	0	0.46	0.23 (Carbon Disulfide)
Extruders (REXT 1 - REXT 4)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0	0.26	<8.10 (Carbon Disulfide)
Autoclave Curing (AC 1 & AC 2)	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0	1.98	
One 3 1/2 in. Vulcanization Line (EXTMW1 (AC7))	0.75	0.75	0.75	0.00	0.00	25.00	0.00	0	6.69	
One 3 1/2 in. Vulcanization Line (EXTMW3 (AC9))	0.75	0.75	0.75	0.00	0.00	24.97	0.00	0	6.69	
One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	0.50	0.50	0.50	0.00	0.00	1.90	0.00	0	2.46	1.58 (Carbon Disulfide)
Soapstone Dusting Operations (DUST)	1.20	1.20	1.20	0.00	0.00	0.00	0.00	0	0.00	0.00
Boilers (Worst Case Fuel)	1.18	1.36	0.92	9.28	14.19	0.45	6.82	12,763	0.15	0.15 (Hexane)
Welding Operations	1.78E-03	1.78E-03	1.78E-03	0.00	0.00	0.00	0.00	0	1.03E-04	9.15E-05 (Manganese)
Total PTE of Entire Source	5.60	5.78	5.33	9.28	14.19	52.56	6.82	12,763	18.68	<9.91
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".

**PM_{2.5} listed is direct PM_{2.5}.

(a) FESOP Status

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

Pursuant to 326 IAC 2-8-4 (FESOP) and not applicable, the combined worst-case single HAP emissions (carbon disulfide) from the two (2) 3 1/2 inch vulcanized lines (EXTMW1 (AC7) and EXTMW3 (AC9), the two (2) hot and two (2) cold feed rubber extruders (REXT1 through REXT4), and the two (2) rubber autoclave (AC1 and AC2) shall not exceed 8.10 tons per twelve (12) month consecutive period.

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

Note: The combined VOC limit that renders 326 IAC 2-7 not applicable will be removed with this renewal. This limit was necessary because it previously included EXTMW4 (AC10) and EXTMW5 (AC11), two vulcanization lines that have since been removed from the permit with Administrative Amendment No. 047-31384-00012. The source-wide unlimited VOC emissions are now less than 100 tons per year.

The single HAP limit is an existing FESOP limit. The total combined unlimited HAPs emissions are less than 25 tons per year; therefore, there is no need for a limit to render 326 IAC 2-7 and 326 IAC 2-4.1 not applicable.

(b) PSD Minor Source

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

Federal Rule Applicability

New Source Performance Standards (NSPS)

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

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Rubber Tire Manufacturing are not included for this renewal because the Permittee does not manufacture tires.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63, Subpart JJJJJJ) are not included in the permit for the four (4) natural gas-fired boilers using No. 2 fuel oil as a back-up fuel (BLR1-BLR4). Pursuant to 40 CFR 63.11200(c), oil is one of the boiler subcategories subject to this NESHAP; however, pursuant to the definition of *oil subcategory*, as defined in 40 CFR 63.11237, gas-fired boilers that burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing are not included in this definition. Therefore, each of the four (4) boilers at this source are considered natural gas-fired boilers; and, gas-fired boilers, as defined in 40 CFR 63.11237, are specifically exempted from this rule as indicated in 40 CFR 63.11195(e). Any changes to a boiler (switching fuels or a physical change) that results in the applicability of a different subcategory within Subpart JJJJJJ or in the boiler becoming subject to Subpart JJJJJJ requires the relevant notification procedures as indicated by this NESHAP.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the Potential to Emit After Issuance section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the Potential to Emit After Issuance section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the source is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See Potential to Emit After Issuance section above.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.

State Rule Applicability - Individual Facilities

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

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

The continuous vulcanization line identified as EXTMW1 (AC7) was constructed after January 1, 1980 and has a potential to emit of VOCs greater than 25 tons per year (See Appendix A).

Pursuant to 326 IAC 8-1-6 and M047-24513-00012, issued on December 26, 2007, the following BACT analysis was reviewed and accepted by IDEM, OAQ and will remain in effect for the 3 1/2 inch continuous vulcanization line (EXTMW1 (AC7)):

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

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

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

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

Where,

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

m = Total Number of Months in Period.

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

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

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

- (1) Hot air curing operations:
- (i) using #10 compound: 0.0163 pounds of VOC per pound of rubber utilized;
 - (ii) using #14 compound: 0.0129 pounds of VOC per pound of rubber utilized;
 - (iii) using #13 compound: 0.0128 pounds of VOC per pound of rubber utilized;
 - (iv) using #3 compound: 0.00762 pounds of VOC per pound of rubber utilized;
 - (v) using #22 compound: 0.00294 pounds of VOC per pound of rubber utilized;
 - (vi) using #11 compound: 0.00184 pounds of VOC per pound of rubber utilized;
 - (vii) using #9 compound: 0.00163 pounds of VOC per pound of rubber utilized;
 - (viii) using #8 compound: 0.000825 pounds of VOC per pound of rubber utilized; and
- (2) Mixing operations: 0.000291 pounds of VOC per pound of rubber utilized; and
- (3) Milling operations: 0.000425 pounds of VOC per pound of rubber utilized; and
- (4) Extruding operations: 0.0000697 pounds of VOC per pound of rubber utilized; or
- (5) Other IDEM, OAQ approved emission factor(s).

These emission rates in (1) through (4) above are similar to the current emission factors in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

Note: As determined in the VOC BACT Analysis for M047-24513-00012, issued December 26, 2007, in this case, for each pound of #10 compound that completes the four process steps, the total VOC emissions shall be calculated with 0.0163 pounds of VOC from hot curing, plus 0.000291 pounds of VOC from mixing, plus 0.000425 pounds of VOC from milling, plus 0.0000697 pounds of VOC from extrusion, which equals 0.0171 pounds of VOC emitted per pound of rubber produced, unless otherwise approved by IDEM, OAQ.

- (c) There are no other 326 IAC 8 Rules that are applicable to the vulcanization line EXTMW1 (AC7).

3 1/2 inch continuous vulcanization line, identified as EXTMW3 (AC9)

- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
EXTMW3 (AC9) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.
- (e) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The requirements of 326 IAC 8-1-6 are applicable to facilities constructed after January 1, 1980 and which have the potential to emit of 25 tons per year or more of VOCs. The continuous vulcanization line identified as EXTMW3 (AC9) was constructed after January 1, 1980 and has a potential to emit of VOCs greater than 25 tons per year (See Appendix A). However, the source shall limit the VOC potential emissions from EXTMW3 (AC9) to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC emissions from the one (1) 3 1/2 inch vulcanized line EXTMW3 (AC9), shall not exceed 24.97 tons per twelve (12) month consecutive period.

Note: This is an existing limit.

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

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

Where,

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

m = Total Number of Months in Period.

The emissions rates to be used for the continuous vulcanization line identified as EXTMW3 (AC9) should be the most recent version of the emission factors in the U.S. EPA's AP-42, Volume I, Fifth Edition, Chapter 4, Section 12.

- (f) There are no other 326 IAC 8 Rules that are applicable to the vulcanization line EXTMW3 (AC9).

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

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
EXTMW2 (AC8) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), pursuant to 326 IAC 6-3-1(b)(14) because the potential to emit particulate of the process is less than 0.551 pounds per hour.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
EXTMW2 (AC8) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the unit is less than twenty-five (25) tons per year.
- (i) There are no other 326 IAC 8 Rules that are applicable to the vulcanization line EXTMW2 (AC8).

Banbury Mixer/Mill (BBM)

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

However, the source will be required to operate the baghouse for this unit to remain exempt because the uncontrolled PTE was based on an AP-42 emission factor with a rating of "E" (poor), and may not be representative of this process.

Soapstone dusting operations, identified as DUST

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

Boilers (BLR1-BLR4)

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

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

Boiler PM Compliance Determination (Natural Gas):

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

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

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

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

- (m) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The boilers are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

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

- (n) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
The requirements of 326 IAC 8-4-3 apply to petroleum liquid storage vessels with capacities greater than 39,000 gallons contain VOCs whose true vapor pressure is greater than 10.5 kPa, which were new sources as of January 1, 1980. The requirements of 326 IAC 8-4-3 do not apply because the storage tank has a capacity of less than 39,000 gallons.

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.

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

Emission Unit/Control	Operating Parameters	Frequency
EXTMW1 (AC7) and EXTMW3 (AC9)	Monthly Calculations	Quarterly

Note: This is an existing requirement

The source will be required to operate the baghouse for the Banburry mixer/mill, identified as BBM, because the uncontrolled PTE was based on an AP-42 emission factor with a rating of "E" (poor), and may not be representative of this process.

Note: This is a new requirement with this renewal.

- (b) There are still no testing requirements applicable to this source.

According to the background document for AP-42, Volume I, Fifth Edition, Chapter 4, Section 12, each emissions factor for this type of manufacturing process has a rating of E (poor), since the majority of test results represent averages of just 3 runs (one total gaseous emissions series relies on 4 runs) for just one compound or process. However, the same background document notes that three of the four studies used to derive the emission factors had quality ratings of B (above average).

Further, based on the quarterly reports for VOC emissions reported by the source, the actual VOC emissions are well below the 326 IAC 8-1-6 BACT limit for unit EXTMW1 (AC7) and the 326 IAC 8-1-6 BACT avoidance limit for unit EXTMW3 (AC9).

IDEM believes the emission factors used from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12 are sufficient to estimate emissions from units EXTMW1 (AC7) and EXTMW3 (AC9) in order to demonstrate the compliance status, and testing is not required to verify the validity of these emission factors at this time.

However, in the future IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance.

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 September 20, 2013.

Conclusion

The operation of this stationary rubber products manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. F047-33679-00012.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.

- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Summary**

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Uncontrolled Potential to Emit (tons/year)											
Emission Unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Banbury Mixer/Mill (BBM)	1.22	1.22	1.22	0.00	0.00	0.20	0.00	0	0.46	0.23	Carbon Disulfide
Extruders (REXT 1 - REXT 4)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0	0.26	0.13	Carbon Disulfide
Autoclave Curing (AC 1 & AC 2)	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0	1.98	1.95	Carbon Disulfide
One 3 1/2 in. Vulcanization Line (EXTMW1 (AC7))	0.75	0.75	0.75	0.00	0.00	35.64	0.00	0	6.69	5.69	Carbon Disulfide
One 3 1/2 in. Vulcanization Line (EXTMW3 (AC9))	0.75	0.75	0.75	0.00	0.00	35.64	0.00	0	6.69	5.69	Carbon Disulfide
One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	0.50	0.50	0.50	0.00	0.00	1.90	0.00	0	2.46	1.58	Carbon Disulfide
Soapstone Dusting Operations (DUST)	1.20	1.20	1.20	0.00	0.00	0.00	0.00	0	0.00	0.00	
Boilers (Worst Case Fuel)	1.18	1.36	0.92	9.28	14.19	0.45	6.82	12,763	0.15	0.15	Hexane
Welding Operations	1.78E-03	1.78E-03	1.78E-03	0.00	0.00	0.00	0.00	0	1.03E-04	9.15E-05	Manganese
Total Uncontrolled Emissions	5.60	5.78	5.33	9.28	14.19	73.88	6.82	12,763	18.68	15.28	Carbon Disulfide

Limited Potential to Emit (tons/year)											
Emission Unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Banbury Mixer/Mill (BBM)	1.22	1.22	1.22	0.00	0.00	0.20	0.00	0	0.46	0.23	Carbon Disulfide
Extruders (REXT 1 - REXT 4)	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0	0.26	< 8.1	Carbon Disulfide
Autoclave Curing (AC 1 & AC 2)	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0	1.98		
One 3 1/2 in. Vulcanization Line (EXTMW1 (AC7))	0.75	0.75	0.75	0.00	0.00	<25.00	0.00	0	6.69		
One 3 1/2 in. Vulcanization Line (EXTMW3 (AC9))	0.75	0.75	0.75	0.00	0.00	<24.97	0.00	0	6.69		
One 4 1/2 in. Vulcanization Line (EXTMW2 (AC8))	0.50	0.50	0.50	0.00	0.00	1.90	0.00	0	2.46	1.58	Carbon Disulfide
Soapstone Dusting Operations (DUST)	1.20	1.20	1.20	0.00	0.00	0.00	0.00	0	0.00	0.00	
Boilers (Worst Case Fuel)	1.18	1.36	0.92	9.28	14.19	0.45	6.82	12,763	0.15	0.15	Hexane
Welding Operations	1.78E-03	1.78E-03	1.78E-03	0.00	0.00	0.00	0.00	0	1.03E-04	9.15E-05	Manganese
Total Limited Emissions	5.60	5.78	5.33	9.28	14.19	52.56	6.82	12,763	18.68	< 9.91	0.00

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

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 8 Compound VOC Emission Factor (lb/lb rubber)*	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	PM/PM-10/PM-2.5 Emission Factor (lb/lb rubber)	Total VOC Emissions (tons/yr)	Total HAP Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)	Particulate (PM/PM-10) Control Device	PM/PM-10/PM-2.5 Emissions (tons/yr)	Controlled PM/PM-10/PM2.5 Emissions (tons/yr)***
Banbury Mixing (BBM)**	1,250.00	10,950,000	1.47E-05	5.58E-05	2.81E-05	2.22E-04	0.08	0.31	0.15	Baghouse	1.22	0.23
Banbury Milling (BBM)	1,250.00	10,950,000	2.14E-05	2.89E-05	1.45E-05	0.00E+00	0.12	0.16	0.08	None	0.00	0.00
Potential to Emit (tons/yr) =							0.20	0.46	0.23		1.22	0.23

Methodology

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

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12. According to the background document for AP-42, Volume I, Fifth Edition, Chapter 4, Section 12, all emissions factors are E rated. Each emissions factor has a rating of E (poor), since the majority of test results represent averages of just 3 runs (one total gaseous emissions series relies on 4 runs) for just one compound or process.

*Rubber compound #10 cannot be processed in the Banbury Mixer/Mill (BBM). Therefore the worst-case emission estimates are based on rubber compound #8.

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

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

Appendix A: Emissions Calculations
Rubber Extruders (REXT1 through REXT4) and Autoclaves (AC1 and AC2)

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 8 Compound VOC Emission Factor (lb/lb rubber)*	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	PM/PM-10/PM-2.5 Emission Factor (lb/lb rubber)	Total VOC Emissions (tons/yr)	Total HAP Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)	Particulate (PM/PM-10) Control Device	PM/PM-10/PM-2.5 Emissions (tons/yr)	Controlled PM/PM-10/PM2.5 Emissions (tons/yr)***
Autoclave Curing (AC 1 and AC2)	75.00	657,000	6.65E-05	6.04E-03	5.93E-03	0.00E+00	0.02	1.98	1.95	None	0.00	0.00
Extruders (REXT 1 through REXT4)	1,960.00	17,169,600	3.52E-06	2.99E-05	1.50E-05	2.67E-08	0.03	0.26	0.13	None	0.00	0.00
Potential to Emit (tons/yr) =							0.05	2.24	2.08		0.00	0.00

Methodology

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

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12. According to the background document for AP-42, Volume I, Fifth Edition, Chapter 4, Section 12, all emissions factors are E rated. Each emissions factor has a rating of E (poor), since the majority of test results represent averages of just 3 runs (one total gaseous emissions series relies on 4 runs) for just one compound or process.

*Rubber compound #10 cannot be processed in the autoclaves (AC1 and AC2). Therefore the worst-case emission estimates are based on rubber compound #8.

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

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

Appendix A: Emissions Calculations
Vulcanization Lines

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

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

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

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

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10/ PM 2.5 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	8.25E-04	0.00E+00	9.76E-04	6.43E-04	1.86	0.00	2.20	1.45
Mixing											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	1.47E-05	2.22E-04	5.58E-05	2.81E-05	0.03	0.50	0.13	0.06
Milling											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	2.14E-05	0.00E+00	2.89E-05	1.45E-05	0.00	0.00	0.07	0.03
Extrusion											
To 4 1/2 vulcanization line (EXTMW2)*	514.00	4,502,640	-	3.52E-06	2.67E-08	2.99E-05	1.50E-05	0.01	0.00	0.07	0.03
Potential to Emit (tons/yr) from EXTMW2 =				8.65E-04	2.22E-04	1.09E-03	7.01E-04	1.90	0.50	2.46	1.58

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

Emission Unit	Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	# 10 Compound VOC Emission Factor (lb/lb rubber)	# 8 Compound VOC Emission Factor (lb/lb rubber)	PM/PM-10/ PM 2.5 Emission Factor (lb/lb rubber)	Total HAPs Emission Factor (lb/lb rubber)	Carbon Disulfide HAP Emission Factor (lb/lb rubber)	VOC Emissions (tons/yr)	PM/PM-10 Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Carbon Disulfide HAP Emissions (tons/yr)
Hot Air Curing											
3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	1.63E-02	-	0.00E+00	2.96E-03	2.52E-03	34.01	0.00	6.17	5.25
Mixing											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	2.91E-04	-	3.58E-04	1.20E-04	1.03E-04	0.61	0.75	0.25	0.21
Milling											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	4.25E-04	-	6.96E-08	6.22E-05	5.32E-05	0.89	0.00	0.13	0.11
Extrusion											
To 3 1/2 vulcanization line (EXTMW3)	476.00	4,169,760	6.97E-05	-	4.32E-08	6.43E-05	5.49E-05	0.15	0.00	0.13	0.11
Potential to Emit (tons/yr) from EXTMW3 =			1.71E-02		3.58E-04	3.21E-03	2.73E-03	35.64	0.75	6.69	5.69

Methodology

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

Emission Factors are from AP-42, Volume I, Fifth Edition, Chapter 4, Section 12. According to the background document for AP-42, Volume I, Fifth Edition, Chapter 4, Section 12, all emissions factors are E rated. Each emissions factor has a rating of E (poor), since the majority of test results represent averages of just 3 runs (one total gaseous emissions series relies on 4 runs) for just one compound or process.

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

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

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Maximum Process Throughput (lb/hr)	Maximum Process Throughput (lb/yr)	PM/PM-10 Emission Factor (lb/lb rubber)	PM/PM-10/ PM 2.5 Emissions (tons/yr)
5.50	48,180.00	5.00E-02	1.20

Methodology

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Boilers (BLR1, BLR2, BLR3, BLR4)

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Boiler	MMBtu/hr
BLR1	4.2
BLR2	4.2
BLR3	6.3
BLR4	4.2

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
18.9	1020	162.3

	Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.2	0.6	0.6	0.0	8.1	0.4	6.8

*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/1,020 MMBtu

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

HAPS Calculations

	HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Potential Emission in tons/yr	1.704E-04	9.739E-05	6.087E-03	1.461E-01	2.759E-04	1.527E-01

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
Potential Emission in tons/yr	4.058E-05	8.927E-05	1.136E-04	3.084E-05	1.704E-04	4.448E-04
	Total HAPs					1.532E-01
	Worst HAP					1.461E-01

Methodology is the same as above.

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

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

Greenhouse Gas Calculations

	Greenhouse Gas		
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	9,739	0.2	0.2
Summed Potential Emissions in tons/yr	9,739		
CO2e Total in tons/yr	9,798		

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.

Global 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: Emissions Calculations
Industrial Boilers (> 100 mmBtu/hr)
#2 Fuel Oil (Back up fuel)
Small Boilers (BLR1, BLR2, BLR3, BLR4)

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

Boiler	MMBtu/hr
BLR1	4.2
BLR2	4.2
BLR3	6.3
BLR4	4.2

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.1

18.9

1182.6

	Pollutant						
Emission Factor in lb/kgal	PM* 2.0	PM10 2.3	direct PM2.5 1.6	SO2 15.7 (157S)	NOx 24.0	VOC 0.20	CO 5.0
Potential Emission in tons/yr	1.2	1.4	0.9	9.3	14.2	0.1	3.0

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	3.31E-04	2.48E-04	2.48E-04	2.48E-04	7.45E-04

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	2.48E-04	4.97E-04	2.48E-04	1.24E-03

Total HAPs	4.056E-03
Worst HAP	1.242E-03

	Greenhouse Gas		
Emission Factor in lb/kgal	CO2 21,500	CH4 0.216	N2O 0.26
Potential Emission in tons/yr	12,713	0.1	0.2
Summed Potential Emissions in tons/yr	12,713		
CO2e Total in tons/yr	12,763		

Methodology

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

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

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

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

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

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

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

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.

Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)

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

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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: Emissions Calculations
Welding

Company Name: Sperry & Rice Manufacturing Company, LLC
Address City IN Zip: 9146 U.S. 52, Brookville, IN 47012
Permit No.: F047-33679-00012
Reviewer: Sarah Street

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10 = PM2.5	Mn	Ni	Cr	
WELDING											
Shielded Metal Arc Welding (E308)	1	0.005707763	0.0108	0.000252	0.000043	0.000394	6.16E-05	1.44E-06	2.45E-07	2.25E-06	3.93E-06
Shielded Metal Arc Welding (E7018)	1	0.017123288	0.0184	0.00103	0.000002	0.000006	3.15E-04	1.76E-05	3.42E-08	1.03E-07	1.78E-05
Gas Metal Welding (E70S)	1	0.005707763	0.0052	0.000318	0.000001	0.000001	2.97E-05	1.82E-06	5.71E-09	5.71E-09	1.83E-06
EMISSION TOTALS											
Potential Emissions lbs/hr							4.06E-04	2.09E-05	2.85E-07	2.36E-06	2.35E-05
Potential Emissions lbs/day							9.75E-03	5.01E-04	6.85E-06	5.66E-05	5.65E-04
Potential Emissions tons/year							1.78E-03	9.15E-05	1.25E-06	1.03E-05	1.03E-04

METHODOLOGY

*Emission factors are default values for carbon steel unless a specific electrode type is noted in the process column.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



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

March 17, 2014

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

Re: Public Notice
Sperry & Rice Manufacturing Co., LLC
Permit Level: Federally Enforceable State
Operating Permit (FESOP) Renewal
Permit Number: 047-33679-00012

Dear James R Gregory:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Brookville Public Library, 919 Main Street in Brookville, IN 47012. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Brookville Democrat in Brookville, IN 47012, publish this notice no later than Wednesday, March 19, 2014.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Sarah Street, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8427 or dial (317) 232-8427.

Sincerely,

Pam Kay Way
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover letter. dot 3/27/08



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 17, 2014

Brookville Democrat
PO Box 38
Brookville, IN 47012

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Sperry & Rice Manufacturing Company, LLC, Franklin County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Wednesday, March 19, 2014.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1003, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Pam Kay Way at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Pam Kay Way
Permit Branch
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP) Renewal
Permit Number: 047-33679-00012

Enclosure
PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

March 17, 2014

To: Brookville Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Sperry & Rice Manufacturing Company, LLC
Permit Number: 047-33679-00012

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

March 17, 2014

Sperry & Rice Manufacturing Company, LLC

047-33679-00012

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.


If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13



Mail Code 61-53

IDEM Staff	PWAY 3/17/2014 Sperry & Rice Mfg Co. LLC 047-33679-00012 (draft)		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	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		James R Gregory Sperry & Rice Mfg Co, LLC 9146 US 52 Brookville IN 47012 (Source CAATS)									
2		Franklin County Commissioners 459 Main Street Brookville IN 47012 (Local Official)									
3		Franklin County Health Department 459 Main St, Courthouse Brookville IN 47012-1405 (Health Department)									
4		Brookville Town Twp Public Library 919 Main St Brookville IN 47012-1498 (Library)									
5		Brookville Town Council 634 Main St. Brookville IN 47012 (Local Official)									
6		Bill Huston 945 Brown School Road Vandalia OH 45377 (Consultant)									
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