



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

Carol S. Comer
Commissioner

To: Interested Parties

Date: July 6, 2016

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

Source Name: T & M Rubber Inc.

Permit Level: MSOP

Permit Number: 039-37061-00023

Source Location: 1102 S 10th St Goshen, IN 46526

Type of Action Taken: Initial Permit
Revisions to permit requirements

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 37061.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

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

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

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

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

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



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Commissioner

Minor Source Operating Permit OFFICE OF AIR QUALITY

**T&M Rubber, Inc.
1102 South 10th Street
Goshen, Indiana 46526**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-37061-00023	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 6, 2016 Expiration Date: July 6, 2021

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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

Source Address:	1102 South 10th Street, Goshen, Indiana 46526
General Source Phone Number:	(574) 533-3173
SIC Code:	3053 (Gaskets, Packing, and Sealing Devices)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) raw material compounding department, identified as EU-1, constructed in 1990, with a maximum capacity of 150 pounds of raw materials per hour, using a dust collector for particulate control, exhausting to the indoors.
- (b) One (1) mixing department, identified as EU-2, constructed in 1954 and 1955, consisting of four (4) mixers, with a combined maximum capacity of 250 pounds per hour, using a common dust collector for the four (4) mixers, identified as the Aget System, for particulate control, and exhausting to stack A.
- (c) One (1) extruding department, identified as EU-3, constructed in 1990, consisting of three (3) extruders, with a combined maximum capacity of 250 pounds per hour, uncontrolled, and exhausting to the indoors.
- (d) One (1) curing department, identified as EU-4, constructed in 1990, consisting of the following:
 - (1) Two (2) autoclave ovens, with a combined maximum capacity of 400 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.
 - (2) Five (5) electric recure ovens, with a combined maximum capacity of 50 pounds of rubber per hour, uncontrolled, and exhausting indoors.
- (e) One (1) rubber tube grinding area, identified as EU-5, constructed in 1965, consisting of four (4) grinders, with a combined maximum capacity of 65 pounds of rubber per hour, using a common wet scrubber system for the four (4) grinders for particulate control, and exhausting to stack C.

- (f) One (1) cutting area, identified as EU-6, constructed in 1990, consisting of five (5) cutters, with a combined maximum capacity of 65 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.

- (g) One (1) natural gas-fired boiler, identified as B1, constructed in 1965, with a maximum heat input of 6.69 MMBtu/hr (200 BHP), used to provide heat for the autoclave ovens, exhausting to stack B.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M039-37061-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 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

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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
- (c) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, 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 Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M039-37061-00023 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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.

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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.10 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 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.13 Response to Excursions or Exceedances

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

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.17 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) 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.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) raw material compounding department, identified as EU-1, constructed in 1990, with a maximum capacity of 150 pounds of raw materials per hour, using a dust collector for particulate control, exhausting to the indoors.
- (b) One (1) mixing department, identified as EU-2, constructed in 1954 and 1955, consisting of four (4) mixers, with a combined maximum capacity of 250 pounds per hour, using a common dust collector for the four (4) mixers, identified as the Aget System, for particulate control, and exhausting to stack A.
- (c) One (1) extruding department, identified as EU-3, constructed in 1990, consisting of three (3) extruders, with a combined maximum capacity of 250 pounds per hour, uncontrolled, and exhausting to the indoors.
- (d) One (1) curing department, identified as EU-4, constructed in 1990, consisting of the following:
 - (1) Two (2) autoclave ovens, with a combined maximum capacity of 400 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.
 - (2) Five (5) electric recure ovens, with a combined maximum capacity of 50 pounds of rubber per hour, uncontrolled, and exhausting indoors.
- (e) One (1) rubber tube grinding area, identified as EU-5, constructed in 1965, consisting of four (4) grinders, with a combined maximum capacity of 65 pounds of rubber per hour, using a common wet scrubber system for the four (4) grinders for particulate control, and exhausting to stack C.
- (f) One (1) cutting area, identified as EU-6, constructed in 1990, consisting of five (5) cutters, with a combined maximum capacity of 65 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.
- (g) One (1) natural gas-fired boiler, identified as B1, constructed in 1965, with a maximum heat input of 6.69 MMBtu/hr (200 BHP), used to provide heat for the autoclave ovens, exhausting to stack B.

(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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the rubber tube grinding area, which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the natural gas-fired boiler (identified as B1) shall in no case exceed 0.8 pounds per MMBtu heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the wet scrubber for particulate control shall be in operation and control emissions from the grinders in the rubber tube grinding area at all times the grinders are in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Scrubber Parametric Monitoring

- (a) The Permittee shall record the pressure drop of the wet scrubber system at least once per day when the grinders in the rubber tube grinding area are in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 1.0 and 8.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the flow rate of the wet scrubber system at least once per day when the grinders in the rubber tube grinding area are in operation. When for any one reading, the flow rate across the scrubber is below the normal minimum the Permittee shall take reasonable response. The normal minimum flow rate for this unit is 10 gallons per minute, unless a different normal minimum flow rate is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A flow rate reading that is below the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (c) The instruments used for determining the pressure drop and flow rate shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.6 Scrubber Detection

- (a) For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).
- (b) For a scrubber controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of the pressure drop and flow rate of the wet scrubber system. The Permittee shall include in its daily record when pressure drop and flow rate notations are not taken and the reason for the lack of pressure drop and flow rate notations (e.g. the process did not operate that day).

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	T&M Rubber, Inc.
Address:	1102 South 10th Street
City:	Goshen, Indiana 46526
Phone #:	(574) 533-3173
MSOP #:	M039-37061-00023

I hereby certify that T&M Rubber, Inc. is:

still in operation.

I hereby certify that T&M Rubber, Inc. is:

no longer in operation.

in compliance with the requirements of MSOP M039-37061-00023.

not in compliance with the requirements of MSOP M039-37061-00023.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Transitioning to a Minor Source Operating
Permit (MSOP)

Source Description and Location

Source Name: T&M Rubber, Inc.
Source Location: 1102 South 10th Street, Goshen, IN 46526
County: Elkhart
SIC Code: 3053 (Gaskets, Packing, and Sealing Devices)
Operation Permit No.: F 039-34446-00023
Operation Permit Issuance Date: December 18, 2014
MSOP Permit No.: M 039-37061-00023
Permit Reviewer: Brian Williams

On April 11, 2016, the Office of Air Quality (OAQ) received an application from T&M Rubber, Inc. related to the transition of a FESOP to a MSOP due to updated information. There are no new emissions units involved in this transition.

Existing Approvals

The source has been operating under New Source Construction and FESOP No. 039-34446-00023, issued on December 18, 2014.

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

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (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. Elkhart 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}**
 Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

Permitting History:

- (a) **1987**
 T&M Rubber, Inc. was issued an Operation Permit No. 20-09-90-0661 on February 18, 1987, for a rubber gasket and seal manufacturing facility. This permit expired on September 1, 1990 and the source has not been issued any subsequent permits.
- (b) **2014**
 On January 21, 2014, this source was inspected by IDEM. As a result of this inspection, the source was required to submit a permit application to IDEM to determine the appropriate permit level for this source. The source submitted the application on April 17, 2014 and was issued a New Source Construction and FESOP No. 039-34446-00023 on December 18, 2014. This permit level determination was based on information provided by T&M Rubber, Inc. at that time.
- (c) **2016**
 On April 11, 2016, T&M Rubber, Inc. submitted an application to transition from a FESOP to a MSOP due to updated information.

After further review by the source and with assistance from IDEM's Compliance and Enforcement Branch, the source has identified the following issues:

1. The source has determined that the information provided in 2014 to IDEM overstated the maximum capacity and particulate matter emissions from the rubber tube grinding process. The table below compares the current permitted capacity and potential emissions with the revised capacity and potential emissions:

Process	Permitted Maximum Capacity (lbs/hr)	Revised Maximum Capacity (lbs/hr)	Permitted Unlimited Potential to Emit PM* (tons/yr)	Revised Unlimited Potential to Emit PM* (tons/yr)
Rubber Tube Grinding	300	65	293.46	96.36
*Assumes PM=PM10=PM2.5				

Based on this new information the source-wide unlimited potential to emit PM, PM10, and PM2.5 is less than one hundred (100) tons per year. Therefore, the source has requested to transition from a FESOP to a MSOP.

2. The source has determined that the information provided in 2014 to IDEM overstated the maximum capacities for the rubber gasket seal manufacturing operations. The table below compares the current permitted capacity and with the revised capacity:

Process	Permitted Maximum Capacity (lbs/hr)	Revised Maximum Capacity (lbs/hr)
Compounding	200	150
Mixing	300	250
Extruding	400	250
Autoclave Curing	750	400
Hot Air Curing	375	50

3. Based on information provided in 2014 by the source in the initial FESOP application they can produce various types of rubber depending upon customer application requirements. IDEM reviewed the material safety data sheets provided then by the source and determined the source has the ability to produce the following compounds: #3, #5, #6, #8 through #12, #14 through #17, and #19 through #22 from AP-42 draft Section 4.12. IDEM then used the worst case emission factor for each pollutant emitted by the various rubber manufacturing processes.

The source has re-evaluated the type of rubber compounds that they process and determined that the source is not capable of processing tire tread (compound #6). Compound #22 reflects the most similar compound processed by the extruders. Therefore, the unlimited potential to emit calculations has been revised to reflect the revised maximum capacities and correct compounds processed.

4. Prior to this permit application, the source was subject to the requirements of 40 CFR 63, Subpart VVVVVV (6V), because information supplied in 2014 by the source indicated that the chemical manufacturing process units use feedstocks and generate products that contain concentrations of 1,3-butadiene greater than 0.1 percent by weight. However, as supporting information to justify the transition to a lower level permit, the source has contacted its suppliers of raw materials and received declarations showing that the styrene-butadiene rubber produced by this source does not contain concentrations greater than 0.1 percent by weight of 1,3-butadiene. Therefore, the requirements of 40 CFR 63, Subpart 6V does not apply to this source.

The source consists of the following permitted emission units, which reflects the above information:

- (a) One (1) raw material compounding department, identified as EU-1, constructed in 1990, with a maximum capacity of 150 pounds of raw materials per hour, using a dust collector for particulate control, exhausting to the indoors.
- (b) One (1) mixing department, identified as EU-2, constructed in 1954 and 1955, consisting of four (4) mixers, with a combined maximum capacity of 250 pounds per hour, using a common dust collector for the four (4) mixers, identified as the Aget System, for particulate control, and exhausting to stack A.
- (c) One (1) extruding department, identified as EU-3, constructed in 1990, consisting of three (3) extruders, with a combined maximum capacity of 250 pounds per hour, uncontrolled, and exhausting to the indoors.

- (d) One (1) curing department, identified as EU-4, constructed in 1990, consisting of the following:
 - (1) Two (2) autoclave ovens, with a combined maximum capacity of 400 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.
 - (2) Five (5) electric recure ovens, with a combined maximum capacity of 50 pounds of rubber per hour, uncontrolled, and exhausting indoors.
- (e) One (1) rubber tube grinding area, identified as EU-5, constructed in 1965, consisting of four (4) grinders, with a combined maximum capacity of 65 pounds of rubber per hour, using a common wet scrubber system for the four (4) grinders for particulate control, and exhausting to stack C.
- (f) One (1) cutting area, identified as EU-6, constructed in 1990, consisting of five (5) cutters, with a combined maximum capacity of 65 pounds of rubber per hour, uncontrolled, and exhausting to the indoors.
- (g) One (1) natural gas-fired boiler, identified as B1, constructed in 1965, with a maximum heat input of 6.69 MMBtu/hr (200 BHP), used to provide heat for the autoclave ovens, exhausting to stack B.

Enforcement Issues

IDEM is aware that there is a pending enforcement action for this source. IDEM is reviewing this matter and will take the appropriate action.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	98.04
PM10 ⁽¹⁾	98.20
PM2.5 ⁽¹⁾	98.20
SO ₂	0.02
NO _x	2.87
VOC	1.45
CO	2.41

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
t-Butyl Methyl Ether	0.24
Carbon Disulfide	0.14
Hexane	0.05
Methylene Chloride	0.003
All other HAPs	0.687
TOTAL HAPs	1.12

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Compounding	0.61	0.61	0.61	0	0	0.29	0	0.09	0.003 Methylene Chloride
Mixing	1.01	1.01	1.01	0	0	0.49	0	0.15	
Extruding	2.56E-05	2.56E-05	2.56E-05	0	0	0.01	0	0.01	0.003 Hexane
Autoclave Curing	0	0	0	0	0	0.32	0	0.59	0.24 t-Butyl Methyl Ether
Hot Air Curing (Recure Ovens)	0	0	0	0	0	0.18	0	0.21	0.14 Carbon Disulfide
Grinding	96.36	96.36	96.36	0	0	0	0	0	0
Cutting	negl.	negl.	negl.	0	0	0	0	0	0
Natural Gas Combustion	0.05	0.22	0.22	0.02	2.87	0.16	2.41	0.05	0.05 Hexane
Paved Roads - Fugitive Emissions	9.73E-03	1.95E-03	4.78E-04	0	0	0	0	0	0
Total PTE of Entire Source	98.04	98.20	98.20	0.02	2.87	1.45	2.41	1.12	0.24 t-Butyl Methyl Ether
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

negl. = negligible

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

Due to this transition from FESOP to MSOP, the existing PM, PM10, and PM2.5 emission limits to render 326 IAC 2-7 (Part 70 Operating Permits) and 326 IAC 2-2 (PSD) have been removed since the source-wide unlimited potential to emit of these pollutants are less than the Title V and PSD Major Source Thresholds. This is a Title 1 change.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the boiler was constructed before June 9, 1989 and has a maximum design heat input capacity less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB (326 IAC 12), are not included in the permit, since this source does not manufacture rubber tires.
- (c) 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)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX (326 IAC 20-55), are not included in the permit, since this source does not manufacture rubber tires and is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in the permit, since this boiler is a gas-fired boiler as defined in 40 CFR 63.11237. Pursuant to 40 CFR 63.11195(e), gas-fired boilers are not subject to this subpart.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, 40 CFR 63, Subpart VVVVVV (326 IAC 20), are not included in the permit since the chemical manufacturing processes at this source do not use as feedstock, any material that contains quinoline, manganese, and/or trivalent chromium at an individual concentration greater than 1.0 percent by weight, or any other Table 1 HAP at an individual concentration greater than 0.1 percent by weight.

This is a change in applicability due to new information provided by the source to IDEM.

- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (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 Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
 - (1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
 - (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the paved roads have potential fugitive particulate emissions less than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compounding, Mixing, Extruding, and Curing

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The compounding, mixing, and extruding departments each have potential particulate matter emissions less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are not subject to the requirements of 326 IAC 6-3-2.
- The autoclave and recure ovens do not have the potential to emit particulate matter. Therefore, these emission units are not subject to 326 IAC 6-3-2.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The compounding, mixing, extruding, and curing departments are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each department is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)
This rule applies to source that manufacture pneumatic rubber passenger type tires on a mass production basis. This source manufactures rubber gaskets and seals and is therefore not subject to this rule.
- (d) There are no other 326 IAC 8 Rules that are applicable to these emission units.

Rubber Tube Grinding and Cutting

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the rubber grinding area, which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.
- The wet scrubber system shall be in operation at all times the rubber tube grinding area is in operation, in order to comply with this limit.
- The allowable 326 IAC 6-3-2 particulate matter limit has been decreased due to the source providing a revised maximum process weight rate for this process.
- (2) The rubber tube cutting area has negligible particulate emissions. Therefore, this process is not subject to 326 IAC 6-3-2.
- (b) There are no other 326 IAC 8 Rules that are applicable to the rubber tube grinding and cutting areas because these areas do not have the potential to emit VOC.

Natural Gas-Fired Boiler

- (a) 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired boiler (B1), which was constructed in 1965, is subject to 326 IAC 6-2-3 because it was existing and in operation prior to September 21, 1983. Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from this boiler must be calculated using the following equation:

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

Where:

- C = maximum ground level concentration with respect to distance from the point source at "critical" wind speed for level terrain (50).
P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
Q = total source operating capacity (1 boiler with a heat input of 6.69 MMBtu/hour)
N = number of stacks in fuel burning operation (1)
a = 0.67 rise factor
h = stack height (1 stack 30 feet high)

$$P_t = \frac{50 \times 0.67 \times 30}{76.5 \times 6.69^{0.75} \times 1^{0.25}}$$

$$P_t = 3.16 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/mmBtu heat input. Since the limit calculated using the formula in 326 IAC 6-2-3(a) is greater than the limit in 326 IAC 6-2-3(d), the boiler must comply with a PM limit of 0.8 lb/MMBtu heat input.

Based on the calculations below, the boiler B1 can comply with this limit.

When burning natural gas:

$$\text{PM Emissions} = 1.9 \text{ lb PM/MMSCF} \times \text{MMSCF}/1,020 \text{ MMBtu} = 0.0019 \text{ lbs/MMBtu}$$

This limit has increased due to the source providing a different construction date of the boiler. The source previously indicated the boiler was constructed in 1977. Based on this 1977 date, pursuant to 326 IAC 6-2-3(e), the PM limit was 0.6 lb/MMBtu heat input.

The construction date of the boiler B1 was changed from 1977 to 1965.

- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired boiler is 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.
- (c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from the natural gas-fired boiler is less than twenty-five (25) tons per year and ten (10) pounds per hour.

- (d) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The natural gas-fired boiler is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the boiler is less than twenty-five (25) tons per year.
- (e) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired boiler is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.
- (f) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired boiler is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Rubber Tube Grinding Area / Wet Scrubber System	Pressure Drop	Once per day
	Flowrate	Once per day

These compliance monitoring requirements are necessary to demonstrate compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (b) There are no testing requirements applicable to this source. The source last performed controlled PM, PM10, and PM2.5 testing of the rubber tube grinders on November 24, 2015. The results of that test were approved by IDEM on March 29, 2016. Since the source no longer has FESOP and PSD minor limits for these pollutants testing is no longer required.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 11, 2016.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-37061-00023. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

**Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams**

Uncontrolled Potential to Emit (tons/year)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Compounding	0.61	0.61	0.61	0	0	0.29	0	0.09	0.003	Methylene Chloride
Mixing	1.01	1.01	1.01	0	0	0.49	0	0.15		Hexane
Extruding	2.56E-05	2.56E-05	2.56E-05	0	0	0.01	0	0.01	0.003	t-Butyl Methyl Ether
Autoclave Curing	0	0	0	0	0	0.32	0	0.59	0.24	Carbon Disulfide
Hot Air Curing (Recure Ovens)	0	0	0	0	0	0.18	0	0.21	0	
Grinding	96.36	96.36	96.36	0	0	0	0	0	0	
Cutters	negl.	negl.	negl.	0	0	0	0	0	0	
Combustion	0.05	0.22	0.22	0.02	2.87	0.16	2.41	0.05	0.05	Hexane
Paved Roads - Fugitive Emissions	9.73E-03	1.95E-03	4.78E-04	0	0	0	0	0	0	
Total	98.04	98.20	98.20	0.02	2.87	1.45	2.41	1.12	0.24	t-Butyl Methyl Ether

**Appendix A: Emission Calculations
Rubber Manufacturing**

Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams

Process	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM/PM10 Emission Factor (lbs/lb rubber)	PM/PM10 (lbs/hr)	PM/PM10 (tons/yr)	PM/PM10 Control Efficiency	PM/PM10 after controls (lbs/hr)	PM/PM10 after controls (tons/yr)
Compounding*	150	4.44E-04	0.07	0.29	1.40E-04	0.02	0.09	9.25E-04	0.14	0.61	0%	1.39E-01	0.61
Mixing*	250	4.44E-04	0.11	0.49	1.40E-04	0.04	0.15	9.25E-04	0.23	1.01	0%	2.31E-01	1.01
Extruding**	250	8.30E-06	0.00	0.01	9.30E-06	0.00	0.01	2.34E-08	5.85E-06	2.56E-05	0%	5.85E-06	2.56E-05
Autoclave/Curing*	400	1.83E-04	0.07	0.32	3.38E-04	0.14	0.59	NA	NA	NA	0%	NA	NA
Hot Air Curing (Recure Ovens)***	50	8.25E-04	0.04	0.18	9.76E-04	0.05	0.21	NA	NA	NA	0%	NA	NA
Totals:			0.25	1.29		0.24	1.06		0.37	1.62		0.37	1.62

Emission Factors from AP-42 draft Section 4.12, 2008.

*Based on information provided by source they can produce various types of rubber depending upon customer application requirements. IDEM has reviewed the MSDS provided by the source and determined the source has the ability to produce the following compounds: #3, #5, #8 through #12, #14 through #17, and #19 through #22. Therefore, for each pollutant and process (except extruding and hot air curing) IDEM has used the highest emission factor for the previously mentioned compounds.

**Based on information provide by the source, compound #22 represents the most similar rubber compound processed by the extruder.

*** The recure ovens are only used to cure certain polymers such as EPDM (Compounds #8, #9, & #10), Polyacrylate (Compound #20), and Fluoroelastomer (FKM) (Compound #16). Therefore, the emission factors for compound #8 (EPDM 1) have been used, since hot air curing emission factors are not available for the other two polymers. This is a batch process that can take between 2 and 16 hours. For worst case emissions IDEM has assumed each batch takes two hours.

Compounding and Mixing

VOC and HAPs EF = Compound #17
PM EF = Compound #5

Extruding

VOC EF = Compound #22
HAP EF = Compound #22
PM EF = Compound #22

Autoclave/Curing

VOC and HAPs EF = Compound #21

Hot Air Curing

VOC and HAPs EF = Compound #8

Methodology

VOC/HAPs/PM (lbs/hr) = Rubber Throughput (lbs/hr) x EF (lbs/lb rubber)

VOC/HAPs/PM (tons/yr) = VOC/HAPs/PM (lbs/hr) x 8,760 (hr/yr) x 1/2,000 (ton/lbs)

See page 3 for detailed HAPs calculations

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams

Compounding and Mixing

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,1,1-Trichloroethane	6.03E-08	400	2.41E-05	1.06E-04
2-Butanone	1.04E-06	400	4.16E-04	1.82E-03
4-Methyl-2-Pentanone	1.65E-07	400	6.62E-05	2.93E-04
Acetophenone	1.46E-08	400	5.81E-06	2.55E-05
Aniline	5.13E-07	400	2.05E-04	8.99E-04
bis(2-Ethylhexyl)phthalate	2.40E-09	400	9.61E-07	4.21E-06
Cadmium (Cd) Compounds	2.65E-09	400	1.06E-06	4.64E-06
Chloroethane	2.01E-07	400	8.04E-05	3.52E-04
Chloromethane	8.86E-07	400	3.55E-04	1.55E-03
Chromium (Cr) Compounds	4.20E-08	400	1.68E-05	7.36E-05
Cumene	9.43E-09	400	3.77E-06	1.65E-05
Ethyl Acrylate	4.73E-06	400	1.89E-03	8.28E-03
Hexane	1.13E-04	400	4.52E-02	1.98E-01
m-Xylene + p-Xylene	4.76E-07	400	1.91E-04	8.34E-04
Methylene Chloride	1.65E-05	400	6.62E-03	2.90E-02
Naphthalene	4.01E-08	400	1.60E-05	7.02E-05
Nickel (Ni) Compounds	3.21E-08	400	1.28E-05	5.63E-05
o-Xylene	5.09E-07	400	2.04E-04	8.92E-04
Phenol	1.27E-06	400	5.08E-04	2.22E-03
Toluene	1.04E-06	400	4.14E-04	1.81E-03

Emission factors for Compound #17 were used for compounding and mixing

Extruding

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,1,1-Trichloroethane	3.48E-08	250	8.69E-06	3.81E-05
1,3-Butadiene	7.83E-08	250	1.96E-05	8.57E-05
1,4-Dichlorobenzene	1.97E-09	250	4.92E-07	2.16E-06
2-Butanone	9.28E-08	250	2.32E-05	1.02E-04
2-Chloroacetophenone	5.35E-09	250	1.34E-06	5.85E-06
4-Methyl-2-Pentanone	1.63E-06	250	4.08E-04	1.79E-03
Acetophenone	1.65E-08	250	4.13E-06	1.81E-05
Acrolein	1.04E-07	250	2.61E-05	1.14E-04
Aniline	2.23E-07	250	5.57E-05	2.44E-04
Benzene	1.28E-07	250	3.20E-05	1.40E-04
Biphenyl	4.42E-09	250	1.11E-06	4.84E-06
bis(2-Ethylhexyl)phthalate	1.55E-07	250	3.87E-05	1.70E-04
Carbon Disulfide	1.16E-07	250	2.89E-05	1.27E-04
Chloroethane	5.36E-08	250	1.34E-05	5.86E-05
Chloroform	3.81E-08	250	9.52E-06	4.17E-05
Chloromethane	1.89E-07	250	4.71E-05	2.06E-04
Chromium (Cr) Compounds	2.54E-07	250	6.34E-05	2.78E-04
Cobalt (Co) Compounds	1.02E-08	250	2.56E-06	1.12E-05
Cumene	1.24E-07	250	3.10E-05	1.36E-04
Di-n-butylphthalate	5.01E-08	250	1.25E-05	5.49E-05
Dibenzofuran	2.67E-09	250	6.69E-07	2.93E-06
Ethylbenzene	3.57E-07	250	8.92E-05	3.91E-04
Hexane	2.49E-06	250	6.23E-04	2.73E-03
Isocane	3.71E-09	250	9.28E-07	4.06E-06
Isophorone	8.45E-08	250	1.61E-05	7.08E-05
m-Xylene + p-Xylene	5.22E-07	250	1.30E-04	5.71E-04
Methylene Chloride	8.18E-08	250	2.04E-05	8.95E-05
Naphthalene	6.30E-08	250	1.58E-05	6.90E-05
Nickel (Ni) Compounds	4.91E-07	250	1.23E-04	5.37E-04
o-Xylene	4.77E-07	250	1.19E-04	5.23E-04
Phenol	5.07E-08	250	1.27E-05	5.55E-05
Propylene Oxide	4.42E-07	250	1.11E-04	4.85E-04
Styrene	3.93E-08	250	9.82E-06	4.30E-05
Tetrachloroethene	1.71E-07	250	4.28E-05	1.87E-04
Toluene	3.67E-07	250	9.18E-05	4.02E-04
Trichloroethene	3.30E-07	250	8.25E-05	3.61E-04
Vinyl Chloride	3.26E-08	250	8.14E-06	3.57E-05

Emission factors for Compound #22 were used for extruding.

Autoclave Curing

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,4-Dichlorobenzene	3.76E-09	400	1.51E-06	6.59E-06
2-Butanone	2.03E-06	400	8.11E-04	3.55E-03
Acetaldehyde	1.73E-06	400	6.92E-04	3.03E-03
Acetophenone	5.52E-08	400	2.21E-05	9.68E-05
Acrolein	5.62E-06	400	2.25E-03	9.85E-03
Benzene	4.69E-06	400	1.88E-03	8.22E-03
bis(2-Ethylhexyl)phthalate	2.44E-06	400	9.77E-04	4.28E-03
Carbon Disulfide	1.04E-06	400	4.17E-04	1.83E-03
Carbon Tetrachloride	4.16E-07	400	1.67E-04	7.30E-04
Carbonyl Sulfide	2.69E-07	400	1.07E-04	4.71E-04
Chloroform	3.97E-07	400	1.59E-04	6.96E-04
Chloromethane	6.05E-06	400	2.42E-03	1.06E-02
Cumene	5.68E-07	400	2.27E-04	9.95E-04
Di-n-butylphthalate	1.70E-07	400	6.79E-05	2.97E-04
Ethylbenzene	2.00E-06	400	8.00E-04	3.50E-03
Hexane	1.44E-06	400	5.76E-04	2.52E-03
Isocane	4.23E-06	400	1.69E-03	7.41E-03
m-Xylene + p-Xylene	7.36E-06	400	2.94E-03	1.29E-02
Methylene Chloride	4.83E-05	400	1.93E-02	8.47E-02
Naphthalene	7.08E-08	400	2.83E-05	1.24E-04
o-Xylene	9.89E-05	400	3.96E-02	1.73E-01
Phenol	6.21E-08	400	2.48E-05	1.09E-04
Styrene	1.39E-09	400	5.56E-07	2.43E-06
t-Butyl Methyl Ether	1.35E-04	400	5.41E-02	2.37E-01
Tetrachloroethene	1.59E-07	400	6.35E-05	2.78E-04
Toluene	1.50E-05	400	5.98E-03	2.62E-02

Emission factors for Compound #21 were used for the autoclave

Hot Air Curing

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,3-Butadiene	1.24E-06	50	6.19E-05	2.71E-04
Acetophenone	2.13E-04	50	1.07E-02	4.67E-02
Aniline	1.48E-07	50	7.39E-06	3.24E-05
Benzene	4.88E-05	50	2.44E-03	1.07E-02
Biphenyl	3.92E-07	50	1.96E-05	8.59E-05
bis(2-Ethylhexyl)phthalate	2.74E-07	50	1.37E-05	6.01E-05
Carbon Disulfide	6.43E-04	50	3.22E-02	1.41E-01
Cumene	8.08E-08	50	4.04E-06	1.77E-05
Dibenzofuran	2.10E-06	50	1.05E-04	4.60E-04
Dimethylphthalate	3.19E-08	50	1.60E-06	6.99E-06
Hexane	3.13E-06	50	1.57E-04	6.85E-04
Xylenes	5.35E-05	50	2.67E-03	1.17E-02
Methylene Chloride	3.61E-06	50	1.81E-04	7.91E-04
Naphthalene	1.07E-06	50	5.35E-05	2.34E-04
Phenol	3.41E-07	50	1.71E-05	7.47E-05
Styrene	4.25E-07	50	2.13E-05	9.31E-05
Toluene	4.37E-06	50	2.19E-04	9.57E-04

Emission factors for Compound #8 were used for hot air curing

Methodology

Emission Factors from AP-42 draft Section 4.12, 2008.
These calculations are for the maximum potential emissions of each individual HAP
Potential Emissions (lb/hr) = Rubber (lb/hr) x EF (lb/lb rubber)
Potential Emissions (ton/yr) = Potential Emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A: Emission Calculations
Rubber Grinding**

**Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams**

Process	Maximum Throughput (lbs/hr)	Uncontrolled Particulate Input (lb/hr)	Uncontrolled Particulate Input (ton/yr)	Airflow (ACFM)	Grain Loading (Gr/cfm)	Controlled Particulate Emissions (lb/hr)	Controlled Particulate Emissions (ton/yr)
Rubber Grinding	65.00	22.00	96.36	8,000	0.008	0.549	2.40

Assumes PM = PM10 = PM2.5

Uncontrolled particulate input (lb/hr) provided by the source and are based on mass balance.

Controlled emissions based on specifications of the wet scrubber provided by the manufacturer in 1974.

Methodology

Uncontrolled Particulate Input (tons/yr) = Uncontrolled Particulate Input (lb/hr) x 8,760 (hr/yr) x 1/2,000 (ton/lbs)

Controlled Particulate Emissions (lb/hr) = Airflow (ACFM) x Grain Loading (Gr/cfm) x 60 (min/hr) x 1/7,000 (lb/Gr)

Controlled Particulate Emissions (ton/yr) = Controlled Particulate Emissions (lb/hr) x 8,760 (hr/yr) x 1/2,000 (ton/lbs)

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

Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
6.69	1020	57.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.05	0.22	0.22	0.02	2.87	0.16	2.41

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	6.037E-05	3.450E-05	2.156E-03	5.174E-02	9.774E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	1.437E-05	3.162E-05	4.025E-05	1.092E-05	6.037E-05

Total HAPs =	0.05	
Single HAP =	0.052	Hexane

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Heat Input Capacity (MMBtu/hr) = Boiler Horsepower x 33,472 (Btu/hr) x 1/10⁶ (MMBtu/Btu)

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

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

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: T&M Rubber, Inc.
Address City IN Zip: 1102 South 10th Street, Goshen, Indiana 46526
Permit Number: 039-37061-00023
Reviewer: Brian Williams

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Employees Entering Plant	21.0	2.0	42.0	2.0	84.0	14	0.003	0.1	40.6
Employees Exiting Plant	21.0	2.0	42.0	2.0	84.0	14	0.003	0.1	40.6
Box Trucks (Entering and Exiting Plant)	2.0	2.0	4.0	4.0	16.0	14	0.003	0.0	3.9
Semi Trucks (Entering and Exiting Plant)	2.0	2.0	4.0	16.0	64.0	14	0.003	0.0	3.9
Totals			92.0		248.0			0.2	89.0

Average Vehicle Weight Per Trip =

2.7

 tons/trip
Average Miles Per Trip =

0.00

 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

where k =

PM	PM10	PM2.5
0.011	0.0022	0.00054

 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =

2.7

 tons = average vehicle weight (provided by source)
sL =

9.7

 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

Unmitigated Emission Factor, $E_f =$

PM	PM10	PM2.5
0.239	0.048	0.0117

 lb/mile
Mitigated Emission Factor, $E_{ext} =$

0.219	0.044	0.0107
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 lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Employees Entering Plant	4.86E-03	9.72E-04	2.39E-04	4.44E-03	8.89E-04	2.18E-04
Employees Exiting Plant	4.86E-03	9.72E-04	2.39E-04	4.44E-03	8.89E-04	2.18E-04
Box Trucks (Entering and Exiting Plant)	4.63E-04	9.26E-05	2.27E-05	4.23E-04	8.46E-05	2.08E-05
Semi Trucks (Entering and Exiting Plant)	4.63E-04	9.26E-05	2.27E-05	4.23E-04	8.46E-05	2.08E-05
Totals	1.06E-02	2.13E-03	5.23E-04	9.73E-03	1.95E-03	4.78E-04

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

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

TO: Jerry Bernard
T & M Rubber
PO Box 516
Goshen, IN 46527-0516

DATE: July 6, 2016

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

SUBJECT: Final Decision
MSOP
039-37061-00023

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 6, 2016

TO: Goshen Public Library

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

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

Applicant Name: T & M Rubber Inc
Permit Number: 039-37061-00023

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

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

Enclosures
Final Library.dot 2/17/2016

Mail Code 61-53

IDEM Staff	CDENNY 7/6/2016 T & M Rubber 039-37061-00023 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Goshen City Council and Mayors Office 202 South 5th Street Suite 1 Goshen IN 46528 (Local Official)										
5		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
6		Goshen Public Library 601 S 5th St Goshen IN 46526-3994 (Library)										
7		Ms. Teri Schenk Environmental Solutions, LLC PO Box 349 Elkhart IN 46517 (Consultant)										
8		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
9		Occupant 1108 S 11th Street Goshen IN 46526 (Affected Party)										
10		Occupant 1110 S 11th Street Goshen IN 46526 (Affected Party)										
11		Paul Scott 1103 S 11th Street Goshen IN 46526 (Affected Party)										
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