

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**GDx Automotive, Vehicle Sealing Division, Marion Plant
1700 Factory Avenue
Marion, IN 46952**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T053-5651-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality <i>Original signed by Janet McCabe</i>	Issuance Date: May 25, 2001 Expiration Date: May 25, 2006

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source extruding, curing, and coating automotive components.

Responsible Official:	Gregg Pfafman
Source Address:	1700 Factory Avenue, Marion, IN 46952
Mailing Address:	1700 Factory Avenue, P.O. Box 1287, Marion, IN 46952
Phone Number:	765-668-1664
SIC Code:	3069, 3089
County Location:	Grant
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Line 1 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L1-1,2,3,4,5;
- (b) Line 2 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L2-1,2,3,4,5;
- (c) Line 3 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L3-1,2,3,4,5;
- (d) Line 4 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L4-1,2,3,4,5,6,7;
- (e) Line 5 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L5-1,2,3,4,5,6,7;
- (f) Line 6 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L6-1,2,3,4,5,6,7;
- (g) Line 7 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven, two (2) surface coating operations, and one (1) adhesive application operation, exhausting to nine (9) stacks L7-1,2,3,4,5,6,7,8,9;
- (h) Line 8 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L8-1,2,3,4,5;
- (i) One (1) surface coating operation, identified as PN-63 Coating, exhausting to two (2) stacks 63-1,2;
- (j) One (1) adhesive coating operation, identified as Honda Coating, exhausting to stack 29-6a;

- (k) One (1) coating operation, identified as PN-96/GMT-800, consisting of the following:
 - (1) one (1) primer spray booth, exhausting to stack 29-6c,
 - (2) one (1) topcoat spray booth, exhausting to stack 29-8, and
 - (3) one (1) end dip operation, exhausting to the interior of the building.
- (l) One (1) off-line coating booth (GMX130), identified as Off-Line Silicone Booth, exhausting to two (2) stacks OL-1,2;
- (m) One (1) coating operation, identified as Mercedes (9753), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to two (2) stacks FB-1,2,
 - (2) one (1) primer spray booth, exhausting to stack CC1, and
 - (3) one (1) topcoat spray booth, exhausting to stack CC3.
- (n) One (1) coating operation, identified as Mercedes (3806), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to stack M-1,
 - (2) one (1) wipe/clean booth, exhausting to two (2) stacks M-3,4, and
 - (3) one (1) spray coating booth and one optional primer wipe booth, exhausting to two (2) stacks M-5,6.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (A) two (2) boilers with a total maximum rated heat input of 8.37 mmBtu per hour, identified as Boilers #1 and #2; [326 IAC 6-2-4]
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) The requirement from Registration, issued on May 8, 1986, conditions a, b, and c, listing requirements limiting the VOC emissions from the silicone spray booth for Extrusion Line 5 are not applicable because IDEM, OAQ has determined that the potential emissions from the silicone spray booth for Extrusion Line 5 are less than 25 tons per year.
- (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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.

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information 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 kept 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Line 1 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L1-1,2,3,4,5;
- (b) Line 2 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L2-1,2,3,4,5;
- (c) Line 3 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L3-1,2,3,4,5;
- (d) Line 4 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L4-1,2,3,4,5,6,7;
- (e) Line 5 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L5-1,2,3,4,5,6,7;
- (f) Line 6 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L6-1,2,3,4,5,6,7;
- (g) Line 7 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven, two (2) surface coating operations, and one (1) adhesive application operation, exhausting to nine (9) stacks L7-1,2,3,4,5,6,7,8,9;
- (h) Line 8 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L8-1,2,3,4,5;
- (i) One (1) surface coating operation, identified as PN-63 Coating, exhausting to two (2) stacks 63-1,2;
- (j) One (1) adhesive coating operation, identified as Honda Coating, exhausting to stack 29-6a;
- (k) One (1) coating operation, identified as PN-96/GMT-800, consisting of the following:
 - (1) one (1) primer spray booth, exhausting to stack 29-6c,
 - (2) one (1) topcoat spray booth, exhausting to stack 29-8, and
 - (3) one (1) end dip operation, exhausting to the interior of the building.
- (l) One (1) off-line coating booth (GMX130), identified as Off-Line Silicone Booth, exhausting to two (2) stacks OL-1,2;
- (m) One (1) coating operation, identified as Mercedes (9753), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to two (2) stacks FB-1,2,
 - (2) one (1) primer spray booth, exhausting to stack CC1, and
 - (3) one (1) topcoat spray booth, exhausting to stack CC3.
- (n) One (1) coating operation, identified as Mercedes (3806), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to stack M-1,
 - (2) one (1) wipe/clean booth, exhausting to two (2) stacks M-3,4, and
 - (3) one (1) spray coating booth and one optional primer wipe booth, exhausting to two (2) stacks M-5,6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Toxics Control [326 IAC 2-4.1]

- (a) The Mercedes (9753) line shall use less than 10 and 25 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of any single HAP or any combination of HAPs to less than 10 and 25 tons, respectively, per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-4.1 (New Source Toxics Control) not applicable.
- (b) Any change or modification which may increase actual any single HAP and any combination of HAPs usage for each of the PN-63, Honda Coating, PN-96/GMT-800 and Mercedes (3806) lines to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place.

D.1.2 General VOC Reduction Requirements [326 IAC 8-1-6]

- (a) Pursuant to CP053-3806-00017, issued on December 16, 1994, and 326 IAC 8-1-6, the following shall be maintained for the Mercedes (3806) line:
 - (1) The flocking process of the rubber extrusion operation shall be used to as much as possible as a substitute to spraying;
 - (2) The lowest possible volatile organic compound (VOC) content coatings and adhesive shall be used; and
 - (3) Coatings shall be sprayed in sequential applications and with narrow and strict fluid to control usage.

Any change or modification which may increase actual VOC usage for each of the Extrusion Lines 1 through Line 8 Extrusion/Curing, each of the Extrusion Lines 1 through 8 Coating/Adhesive Applications, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800 and New Mercedes (9753) lines to greater than 25 tons per year before add-on controls, shall require OAQ's prior approval before such change can take place.

- (b) Registration 049-3707-00019, issued on May 8, 1986.

Conditions a, b and c on Page 1 of registration:

- (a) That the quantity of silicone coating and solvent content, as percent VOC by weight, be such that the VOC emissions shall not exceed 24.8 tons per year.
- (b) That the amount of silicone coating used shall be limited to 7,250 gallons per year.
- (c) That a log of information necessary to document compliance with conditions (a.) and (b) be maintained. These records shall be kept for at least the past twenty four (24) maintained period and made available upon request of the Air Management Office. A quarterly report shall be submitted to the Office of Air Quality by the end of the month following the quarter.

Reason not incorporated: The Potential emissions from the silicone spray booth for Extrusion Line 5 are as stated on page 2 of 13 of the TSD App A. As these emissions are for five lines, the potential emissions from the silicone spray booth for Extrusion Line 5 are 24.14 tons per year, and no VOC usage limitation is required.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the surface coating operations and adhesive application operations for Lines 4, 5, 6, 7 and 8 and any control devices.

Compliance Determination Requirements

D.1.4 Hazardous Air Pollutant Emissions (HAPs)

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total any single hazardous air pollutant and combined hazardous air pollutant compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.1.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total any single hazardous air pollutant and combined hazardous air pollutants usage for each month; and
 - (4) The weight of any single hazardous air pollutant and combined hazardous air pollutants emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (A) two (2) boilers with a total maximum rated heat input of 8.37 mmBtu per hour, identified as Boilers #1 and #2; [326 IAC 6-2-4]
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to OP 053-4075-00017, issued on November 16, 1994 and 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from each of the two (2) boilers with a total maximum rated heat input of 8.37 mmBtu per hour, identified as Boilers #1 and #2, shall be limited to 0.6 pounds per MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: GDX Automotive, Vehicle Sealing Division, Marion Plant
Source Address: 1700 Factory Avenue, Marion, IN 46952
Mailing Address: 1700 Factory Avenue, P.O. Box 1287, Marion, IN 46952
Part 70 Permit No.: T053-5651-00017

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: GDx Automotive, Vehicle Sealing Division, Marion Plant
Source Address: 1700 Factory Avenue, Marion, IN 46952
Mailing Address: 1700 Factory Avenue, P.O. Box 1287, Marion, IN 46952
Part 70 Permit No.: T053-5651-00017

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: GDX Automotive, Vehicle Sealing Division, Marion Plant
 Source Address: 1700 Factory Avenue, Marion, IN 46952
 Mailing Address: 1700 Factory Avenue, P.O. Box 1287, Marion, IN 46952
 Part 70 Permit No.: T053-5651-00017
 Facility: Mercedes (9753) line
 Parameter: Any single HAP, Any Combination of HAPs

Limit: The Mercedes (9753) line shall use less than 10 and 25 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of any single HAP or any combination of HAPs to less than 10 and 25 tons, respectively, per 12 consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 1 + Column 3	Column 2 + Column 4
	Any Single HAP Usage This Month	Any Combination of HAP Usage This Month	Any Single HAP Usage Previous 11 Months	Any Combination of HAP Usage Previous 11 Months	Any Single HAP Usage 12 Month Total	Any Combination of HAP Usage 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: GDX Automotive, Vehicle Sealing Division, Marion Plant
 Source Address: 1700 Factory Avenue, Marion, IN 46952
 Mailing Address: 1700 Factory Avenue, P.O. Box 1287, Marion, IN 46952
 Part 70 Permit No.: T053-5651-00017

Months: _____ **to** _____ **Year:** _____

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Source Location: 1700 Factory Avenue, Marion, IN 46952
County: Grant
SIC Code: 3069, 3089
Operation Permit No.: T053-5651-00017
Permit Reviewer: Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from GenCorp, Inc., Vehicle Sealing Division, Marion Plant relating to the operation of a stationary source extruding, curing, and coating automotive components.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Line 1 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L1-1,2,3,4,5;
- (b) Line 2 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L2-1,2,3,4,5;
- (c) Line 3 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L3-1,2,3,4,5;
- (d) Line 4 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L4-1,2,3,4,5,6,7;
- (e) Line 5 extrusion and curing operation, with a maximum production rate of 650 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L5-1,2,3,4,5,6,7;
- (f) Line 6 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven, one (1) surface coating operation, and one (1) adhesive application operation, exhausting to seven (7) stacks L6-1,2,3,4,5,6,7;
- (g) Line 7 extrusion and curing operation, with a maximum production rate of 500 pounds of rubber per hour, consisting of one (1) curing oven, two (2) surface coating operations, and one (1) adhesive application operation, exhausting to nine (9) stacks L7-1,2,3,4,5,6,7,8,9;
- (h) Line 8 extrusion and curing operation, with a maximum production rate of 900 pounds of rubber per hour, consisting of one (1) curing oven and one (1) adhesive application operation, exhausting to five (5) stacks L8-1,2,3,4,5;
- (i) One (1) surface coating operation, identified as PN-63 Coating, exhausting to two (2) stacks 63-1,2;
- (j) One (1) adhesive coating operation, identified as Honda Coating, exhausting to stack 29-6a;

- (k) One (1) coating operation, identified as PN-96/GMT-800, consisting of the following:
 - (1) one (1) primer spray booth, exhausting to stack 29-6c,
 - (2) one (1) topcoat spray booth, exhausting to stack 29-8, and
 - (3) one (1) end dip operation, exhausting to the interior of the building.
- (l) One (1) off-line coating booth (GMX130), identified as Off-Line Silicone Booth, exhausting to two (2) stacks OL-1,2;
- (m) One (1) coating operation, identified as Mercedes (9753), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to two (2) stacks FB-1,2,
 - (2) one (1) primer spray booth, exhausting to stack CC1, and
 - (3) one (1) topcoat spray booth, exhausting to stack CC3.
- (n) One (1) coating operation, identified as Mercedes (3806), consisting of the following:
 - (1) two (2) flock booths with adhesive application, exhausting to stack M-1,
 - (2) one (1) wipe/clean booth, exhausting to two (2) stacks M-3,4, and
 - (3) one (1) spray coating booth and one optional primer wipe booth, exhausting to two (2) stacks M-5,6.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (A) two (2) boilers with a total maximum rated heat input of 8.37 mmBtu per hour, identified as Boilers #1 and #2;
 - (B) Space heaters;
 - (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (b) Equipment powered by internal combustion engines or capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour;
- (c) Combustion source flame safety purging on startup;
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (f) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface;

- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 3265 IAC 20-6;
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems;
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (m) Paved and unpaved roads and parking lots with public access;
- (n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emission from those activities would not be associated with any production processes;
- (o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (p) On-site fire and emergency response training approved by the department;
- (q) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower.
 - (2) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (r) A laboratory as defined in 326 IAC 2-7-1(20)(C); and
- (s) Other activities with emissions equal to or less than insignificant thresholds:
 - (1) Mold release in press areas, potential VOC emissions are less than 15 pounds per day in each area.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 27-04-82-0132, issued on November 21, 1978;
- (b) OP 27-04-87-0172, issued on August 17, 1983;
- (c) Registration, issued on May 8, 1986;
- (d) Amendment, issued on July 6, 1988;
- (e) Exemption, issued on July 24, 1989;
- (f) Registration 1600-0017, issued on June 27, 1990;
- (g) Registration CP 053-3079-00017, issued on June 28, 1993;
- (h) Registration CP 053-4075-00017, issued on November 16, 1994;
- (i) CP 053-3806-00017, issued on December 16, 1994;
- (j) CP 053-4298-00017, issued on January 20, 1995;
- (k) CP 053-4458-00017, issued on April 25, 1995;
- (l) Registration CP 053-8486-00017, issued on May 28, 1997;
- (m) Amendment CP 053-8235-00017, issued on March 20, 1997;
- (n) Amendment 053-8607-00017, issued on June 13, 1997;
- (o) Registration CP 053-8989-00017, issued on December 9, 1997;
- (p) Registration CP 053-9502-00017, issued on March 13, 1998; and
- (q) Registration CP 053-9753-00017, issued on June 25, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 1, 1996. Additional information was received on August 29, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 13.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE 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	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10
Toluene	less than 10
Methy Isobutyl Ketone	less than 10
Ethyl Benzene	less than 10
Naphthalene	less than 10
Methylene Diphenyl Diisocyanate	less than 10
Trimethyl Amine	less than 10
Hexane	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year.

Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	78.57
CO	0.00
NO _x	0.00
HAP	Not Reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Natural Gas Combustion	0.07	0.28	0.02	0.20	3.08	3.67	(Hexane) 0.07	0.07
Line 1	0.06	0.06	0.00	3.08	0.00	0.00	(Toluene) 0.29	3.13
Line 2	0.06	0.06	0.00	3.08	0.00	0.00	(Toluene) 0.29	3.13
Line 3	0.06	0.06	0.00	3.08	0.00	0.00	(Toluene) 0.29	3.13
Line 4	3.64	3.64	0.00	27.81	0.00	0.00	(Xylene) 16.06	23.50
Line 5	3.64	3.64	0.00	27.81	0.00	0.00	(Xylene) 16.06	23.50
Line 6	3.64	3.64	0.00	28.71	0.00	0.00	(Xylene) 16.06	24.60
Line 7	3.64	3.64	0.00	27.26	0.00	0.00	(Xylene) 16.06	22.84
Line 8	3.64	3.64	0.00	28.71	0.00	0.00	(Xylene) 16.06	24.60

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Off-Line Silicone Booth (GMX130)	0.11	0.11	0.00	8.11	0.00	0.00	(Xylene) 3.53	4.42
PN-63	0.20	0.20	0.00	17.52	0.00	0.00	(Xylene) 11.86	14.82
Honda Line	0.02	0.02	0.00	2.45	0.00	0.00	(Toluene) 1.81	2.17
PN-96/GMT-800 Line	0.06	0.06	0.00	2.17	0.00	0.00	(Xylene) 1.26	1.92
Mercedes 3806 Line	0.03	0.03	0.00	10.15	0.00	0.00	(Xylene) 1.26	1.59
Mercedes 9753 Line	0.19	0.19	0.00	13.30	0.00	0.00	(Xylene) 9.90	12.47
Flock Adhesive	0.61	0.61	0.00	3.25	0.00	0.00	(Xylene) 1.18	2.34
Total Emissions	19.67	19.88	0.02	206.69	3.08	3.67	(Xylene) 109.40	168.23
PSD Significance levels	250	250	250	250	250	250	N/A	N/A

County Attainment Status

The source is located in Grant County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Grant 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 and 40 CFR 52.21.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Subpart BBB is not applicable since the product is not rubber tires.
- (b) The degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the degreasing operations do not use the listed solvents applicable to this subpart.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 because it is not one of the 28 listed source categories and the potential to emit of all regulated pollutants, after controls, are less than 250 tons per year.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

- (a) The Extrusion Lines 1 through Line 8 and the Off-Line Silicone Booth (GMX130) are not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The emission units were existing as of July 27, 1997, the applicability date for 326 IAC 2-4.1-1.
- (b) The PN-63, Honda Coating, PN-96/GMT-800 and Mercedes (3806) lines each have a potential to emit less than 10 and 25 tons per year of any single HAP and any combination of HAPs, respectively, therefore, these emission units are not subject to 2-4.1-1 (New Source Toxics Control). However, OAM approval will be required prior to exceeding 10 and 25 tons per year of any single HAP and any combination of HAPs, respectively.
- (c) Although the New Mercedes (9753) line has a PTE more than 10 tons per year of a single HAP, the booth will limit the input of any single HAP and any combination of HAPs to less than 10 and 25 tons per year, respectively. Therefore, the New Mercedes (9753) line is not subject to the requirements of 326 IAC 2-4.1.

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

Pursuant to OP 053-4075-00017, issued on November 16, 1994, the two (2) boilers, identified as boilers #1 and #2, rated at 8.37 million British thermal units per hour, are subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the two (2) boilers (both constructed in 1994) are limited by the following equation from 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = boilers #1 + #2 = 8.37 MMBtu/hr

$$Pt = 1.09/8.37^{0.26} = 0.63 \text{ lbs PM/MMBtu}$$

However, for Q less than 10 mmBtu/hr, Pt shall not exceed 0.6. Therefore, the two (2) boilers are each limited to 0.6 lbs PM/MMBtu.

compliance calculation:

$$(0.07 \text{ tons PM/yr}) * (\text{hr}/8.37 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.002 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.002) are less than allowable lbs PM/MMBtu (0.6). Therefore, the two (2) boilers #1 and #2 will comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the Extrusion Lines 1 through Line 8, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800, Mercedes (3806), New Mercedes (9753) lines and the trimmers (insignificant activities) shall be limited by the following:

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

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

326 IAC 8-1-6 (General VOC Reduction Requirements)

Pursuant to CP053-3806-00017, issued on December 16, 1994, the Mercedes (3806) lines are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for the Mercedes (3806) line consists of the following:

- (a) the flocking process of the extrusion operation shall be used as much as possible as a substitute to spraying;
- (b) the lowest possible VOC content coatings and adhesive shall be used;
- (c) coatings shall be sprayed in sequential applications and with narrow and strict fluid to control usage.

The Extrusion Lines 1 through Line 8, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800 and New Mercedes (9753) lines all have VOC emissions of less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply, however, OAM approval will be required prior to exceeding 25 tons per year of VOC.

Testing Requirements

Testing is not required for this source at this time.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements applicable to this source.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 5 through 10 of 13)

Conclusion

The operation of this the operation of a stationary source extruding, curing, and coating automotive components shall be subject to the conditions of the attached proposed **Part 70 Permit No. T053-5651-00017**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: GDX Automotive (formerly Gencorp, Inc.), Vehicle Sealing Division, Marion Plant
Source Location: 1700 Factory Avenue, Marion, IN 46952
County: Grant
Operation Permit No.: T053-5651-00017
SIC Code: 3069, 3089
Permit Reviewer: Phillip Ritz/EVP

On December 20, 2000, the Office of Air Management (OAM) had a notice published in the Marion Chronicle Tribune, Marion, Indiana, stating that GDX Automotive (formerly Gencorp, Inc.), Vehicle Sealing Division, Marion Plant had applied for a Part 70 Operating Permit to construct and operate a stationary source extruding, curing, and coating automotive components. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 19, 2001, GDX Automotive (formerly Gencorp, Inc.), Vehicle Sealing Division, Marion Plant submitted comments on the proposed Part 70 Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1

As of January 3, 2001, GenCorp has changed its name to GDX Automotive. Please change the company name throughout the entire permit.

Response 1

The references to the source name throughout the permit have been changed from Gencorp, Inc., to GDX Automotive.

Comment 2

In December 2000, a permit application was submitted for the installation of three new surface coating operations at the plant. One surface coating operation has been proposed for each of Lines 1, 2 and 3. Pending approval of this application, please reference these lines in the Title V permit.

Response 2

The emission units will not be listed in the Part 70 Operating Permit until the approval for construction and operation has been issued. The IDEM's documents related to that application will address the modification to this Part 70 Operating Permit. No change has been made to the permit as a result of this comment.

Comment 3

We request that Condition B.15 include a statement that specifies that it is not a deviation if compliance monitoring requirements are not followed in inclement weather or when any other unsafe conditions are prevalent. For example, if the plant is snow-covered or the roof is icy, it may not be appropriate to perform rooftop monitoring. Accordingly, we would propose the following addition to Condition B.15(b):

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (3) Failure to conduct compliance monitoring requirements where conditions, such as bad weather, would cause the compliance monitoring to be unsafe, impractical, or not likely to generate any useful data.

Response 3

Condition B.15 addresses deviations if compliance monitoring was required of the source. No compliance monitoring provisions are required in this case, therefore, there has been no changes to the permit as a result of this comment.

Comment 4

For past permitting scenarios and consideration for applicability under 326 IAC 8-1-6, IDEM has always considered the extrusion/curing process on a line as a separate emission unit from the coating/adhesive applications on a line. For this reason, Condition D.1.2 should say:

“Any change or modification which may increase actual VOC usage for each of the Extrusion Lines 1 through 8 Extrusion/Curing, each of the Extrusion Lines 1 through 8 Coating/Adhesive Applications, the Off-Line Silicone Booth”

Response 4

The extrusion/curing operations and coating/adhesive operations in the Extrusion Lines 1 through 8 are separate facilities with respect to 326 IAC 8-1-6, therefore, Condition D.1.2 the permit has been revised as follows:

D.1.2 General VOC Reduction Requirements [326 IAC 8-1-6]

- (a) Pursuant to CP053-3806-00017, issued on December 16, 1994, and 326 IAC 8-1-6, the following shall be maintained for the Mercedes (3806) line:
 - (a)(1) The flocking process of the rubber extrusion operation shall be used to as much as possible as a substitute to spraying;
 - (b)(2) The lowest possible volatile organic compound (VOC) content coatings and adhesive shall be used; and
 - (c)(3) Coatings shall be sprayed in sequential applications and with narrow and strict fluid to control usage.

Any change or modification which may increase actual VOC usage for each of the Extrusion Lines 1 through Line 8 **Extrusion/Curing, each of the Extrusion Lines 1 through 8 Coating/Adhesive Applications**, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800 and New Mercedes (9753) lines to greater than 25 tons per year before add-on controls, shall require OAM's prior approval before such change can take place.

Comment 5

Condition D.1.3 relating to particulate matter limits under 326 IAC 6-3-2 should be deleted because these activities (coating operations) have process rates of less than 100 pounds per hour and therefore are regulated under Condition C.1.

Response 5

Condition D.1.3 is redundant as the emission units in Condition D.1 are already regulated by the requirements of 326 IAC 6-3-2 under Condition C.1 of the permit. Therefore, Condition D.1.3 has been removed from the permit, the remaining D.1 conditions have been renumbered, and the changes to the permit are as follows:

~~D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2, the PM from the Extrusion Lines 1 through Line 8, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800, Mercedes (3806) and Mercedes (9753) lines shall not exceed the pound per hour emission rate established as E in the following formula:—~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

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

Comment 6

Condition D.1.4 requires development of a Preventive Maintenance Plan for Lines 4-8 extrusion and curing operations and any control devices. Preventive Maintenance Plans are only required for control equipment to prevent control equipment malfunctions. Not only is this the law, but it also makes practical sense in the context of this permit where the permitted facilities cannot be "maintained" in a manner to reduce emissions. Instead, for this plant, it is the effectiveness of the control equipment that determines emission rates. Please modify this requirement by stating that a Preventive Maintenance Plan is required "for any control devices associated with the coating operations on Lines 4-8".

Response 6

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5. Condition D.1.3 has been modified as follows to clarify that the Preventive Maintenance Plan applies to the Lines 4, 5, 6, 7 and 8 surface coating operations, and adhesive application operations:

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this **permit, is required for the surface coating operations and adhesive application operations** for Lines 4, 5, 6, 7 and 8 ~~extrusion and curing operations~~ and any control devices.

Comment 7

Condition D.1.6(a)(1) should be changed to say "The amount and VOC content of each coating material and solvent used. Records shall include those necessary to verify the type and amount used . . .," and the overly-prescriptive references to "purchase orders, invoices, and material safety data sheets" should be deleted.

Response 7

The source is required to limit the VOC contents of cleaning solvents and coating as applied, as described in Condition D.1.2. OAQ determines that it is necessary to keep the records as described in Section D.1.6 for the source to show compliance with D.1.2. The purchase orders, invoices, and material safety data sheets are needed to provide specific information about the VOC and HAP emissions from the source to ensure that the listed units. There has been no change to the permit as a result of this comment.

Comment 8

Condition D.2.2 should be deleted because the activities have process rates of less than 100 pounds per hour and therefore are regulated under Condition C.1.

Response 8

Condition D.2.2 is redundant as the emission units in Condition D.2 are already regulated by the requirements of 326 IAC 6-3-2 under Condition C.1 of the permit. Therefore, Condition D.2.2 has been removed from the permit and the changes to the permit are as follows:

~~D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2, the PM from the trimmers (insignificant activities) shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

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

Condition D.1.2 of the permit has been modified to include the following nonapplicability language:

D.1.2 General VOC Reduction Requirements [326 IAC 8-1-6]

- (a) Pursuant to CP053-3806-00017, issued on December 16, 1994, and 326 IAC 8-1-6, the following shall be maintained for the Mercedes (3806) line:
- (a)(1) The flocking process of the rubber extrusion operation shall be used to as much as possible as a substitute to spraying;
 - (b)(2) The lowest possible volatile organic compound (VOC) content coatings and adhesive shall be used; and
 - (c)(3) Coatings shall be sprayed in sequential applications and with narrow and strict fluid to control usage.

Any change or modification which may increase actual VOC usage for each of the Extrusion Lines 1 through Line 8, the Off-Line Silicone Booth (GMX 130), PN-63, Honda Coating, PN-96/GMT-800 and New Mercedes (9753) lines to greater than 25 tons per year before add-on controls, shall require OAM's prior approval before such change can take place.

- (b) **Registration 049-3707-00019, issued on May 8, 1986.**

Conditions a, b and c on Page 1 of registration:

- (a) That the quantity of silicone coating and solvent content, as percent VOC by weight, be such that the VOC emissions shall not exceed 24.8 tons per year.
- (b) That the amount of silicone coating used shall be limited to 7,250 gallons per year.
- (c) That a log of information necessary to document compliance with conditions (a) and (b) be maintained. These records shall be kept for at least the past twenty four (24) maintained period and made available upon request of the Air Management Office. A quarterly report shall be submitted to the Office of Air Management by the end of the month following the quarter.

Reason not incorporated: The Potential emissions from the silicone spray booth for Extrusion Line 5 are as stated on page 2 of 13 of the TSD App A. As these emissions are for five lines, the potential emissions from the silicone spray booth for Extrusion Line 5 are 24.14 tons per year, and no VOC usage limitation is required.

Appendix A: Emission Calculations

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	Line 1	Line 2	Line 3	Line 4	Line 5	Line 6	Line 7	Line 8	Off-Line Silicone Booth (GMX130)	PN-63	Honda Line	PN-96/GMT-800 Line	Mercedes 3806 Line	Mercedes 9753 Line	Flock Adhesive	TOTAL
PM	0.07	0.25	0.25	0.25	13.81	13.81	13.81	13.81	13.81	0.44	3.39	0.15	0.26	0.14	1.24	0.61	76.07
PM10	0.28	0.25	0.25	0.25	13.81	13.81	13.81	13.81	13.81	0.00	0.00	0.00	0.00	0.14	1.24	0.00	71.43
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	3.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.67
VOC	0.20	3.08	3.08	3.08	27.81	27.81	28.71	27.26	28.71	8.11	17.52	2.45	2.17	10.15	22.02	3.25	215.43
CO	3.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.08
total HAPs	0.07	3.13	3.13	3.13	23.50	23.50	24.60	22.84	24.60	4.42	14.82	2.17	1.92	1.59	20.65	2.34	176.42
worst case single HAP	(Hexane) 0.07	(Toluene) 0.29	(Toluene) 0.29	(Toluene) 0.29	(Xylene) 16.06	(Xylene) 3.53	(Xylene) 11.86	(Toluene) 1.81	(Xylene) 1.26	(Xylene) 1.26	(Xylene) 16.40	(Xylene) 1.18	(Xylene) 116.50				

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	Line 1	Line 2	Line 3	Line 4	Line 5	Line 6	Line 7	Line 8	Off-Line Silicone Booth (GMX130)	PN-63	Honda Line	PN-96/GMT-800 Line	Mercedes 3806 Line	Mercedes 9753 Line	Flock Adhesive	TOTAL
PM	0.07	0.06	0.06	0.06	3.64	3.64	3.64	3.64	3.64	0.11	0.20	0.02	0.06	0.03	0.19	0.61	19.66
PM10	0.28	0.06	0.06	0.06	3.64	3.64	3.64	3.64	3.64	0.11	0.20	0.02	0.06	0.03	0.19	0.61	19.87
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	3.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.67
VOC	0.20	3.08	3.08	3.08	27.81	27.81	28.71	27.26	28.71	8.11	17.52	2.45	2.17	10.15	13.30	3.25	206.71
CO	3.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.08
total HAPs	0.07	3.13	3.13	3.13	23.50	23.50	24.60	22.84	24.60	4.42	14.82	2.17	1.92	1.59	12.47	2.34	168.24
worst case single HAP	(Hexane) 0.07	(Toluene) 0.29	(Toluene) 0.29	(Toluene) 0.29	(Xylene) 16.06	(Xylene) 3.53	(Xylene) 11.86	(Toluene) 1.81	(Xylene) 1.26	(Xylene) 1.26	(Xylene) 9.90	(Xylene) 1.18	(Xylene) 109.40				

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Mercedes 3806																
Elastomer Adhesive Primer Chemlock 459X	7.2	96.30%	0.0%	96.3%	0.0%	3.16%	0.05000	1.000	6.93	6.93	0.35	8.32	1.52	0.01	219.42	75%
Topcoat (C41 Mix)	8.6	75.00%	61.5%	13.5%	63.1%	22.31%	0.05300	1.000	3.14	1.16	0.06	1.47	0.27	0.12	5.19	75%
SafeSolv	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.29000	1.000	6.58	6.58	1.91	45.80	8.36	0.00	ERR	75%

State Potential Emissions Add worst case coating to all solvents 2.32 55.59 10.15 0.14

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
VOC	PM				
0.00%	75.00%	2.32	55.59	10.15	0.03

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Mercedes 9753																
Elastomer Adhesive Primer Chemlock 459X	7.2	96.30%	0.0%	96.3%	0.0%	3.16%	0.65000	1.000	6.93	6.93	4.51	108.16	19.74	0.19	219.42	75%
Topcoat (C41 Mix)	8.6	75.00%	61.5%	13.5%	63.1%	22.31%	0.45000	1.000	3.14	1.16	0.52	12.51	2.28	1.05	5.19	75%

State Potential Emissions Add worst case coating to all solvents 5.03 120.67 22.02 1.24

Usage Limitation:	Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
VOC	VOC	PM				
39.63%	0.00%	75.00%	3.04	72.85	13.30	0.19

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Flock Adhesive																
Flock Lok 852 Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.13000	1.000	4.00	4.00	0.52	12.49	2.28	0.61	8.82	75%
Naptha	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.03000	1.000	7.40	7.40	0.22	5.33	0.97	0.00	ERR	75%

State Potential Emissions Add worst case coating to all solvents 0.74 17.82 3.25 0.61

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
VOC	PM				
0.00%	75.00%	0.74	17.82	3.25	0.15

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission s (ton/yr)	Toluene Emission s (ton/yr)	Methy Isobutyl Ketone Emission s (ton/yr)	Ethyl Benzene Emission s (ton/yr)	Napthalene Emission s (ton/yr)	Diphenyl Diisocyanat e Emission s (ton/yr)	Trimethyl Amine Emission s (ton/yr)	Hexane Emission s (ton/yr)	Methyl Ethyl Ketone Emission s (ton/yr)	
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane												
Lines 1-8 Coating Booths																							
End Coat (Colorguard) Elastomer Adhesive Primer Chemlock 459X	5.3	0.50000	1.000	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	10.00%	0.00	2.32	0.00	0.00	0.00	0.00	0.00	0.00	2.32	1.16	
	7.2	0.05125	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.29	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00	
Total State Potential Emissions													1.29	2.32	0.00	0.32	0.00	0.00	0.00	0.00	2.32	1.16	
																			Subtotal				7.42

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission s (ton/yr)	Toluene Emission s (ton/yr)	Methy Isobutyl Ketone Emission s (ton/yr)	Ethyl Benzene Emission s (ton/yr)	Napthalene Emission s (ton/yr)	Diphenyl Diisocyanat e Emission s (ton/yr)	Trimethyl Amine Emission s (ton/yr)	Hexane Emission s (ton/yr)	Methyl Ethyl Ketone Emission s (ton/yr)	
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane												
Lines 4-8 Coating Booths																							
Basecoat (8370A)	8.9	3.12500	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Catalyst (8370C)	8.9	0.15625	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Elastomer Adhesive Primer Chemlock 459X	7.2	3.12500	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	78.84	0.00	0.00	19.71	0.00	0.00	0.00	0.00	0.00	0.00	
Total State Potential Emissions													78.84	0.00	0.00	19.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00
																			Subtotal				98.55

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission s (ton/yr)	Toluene Emission s (ton/yr)	Methy Isobutyl Ketone Emission s (ton/yr)	Ethyl Benzene Emission s (ton/yr)	Napthalene Emission s (ton/yr)	Diphenyl Diisocyanat e Emission s (ton/yr)	Trimethyl Amine Emission s (ton/yr)	Hexane Emission s (ton/yr)	Methyl Ethyl Ketone Emission s (ton/yr)	
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane												
Off-Line Silicone Booth (GMX130)																							
Elastomer Adhesive Primer Chemlock 459X	7.2	0.14000	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.53	0.00	0.00	0.88	0.00	0.00	0.00	0.00	0.00	0.00	
Topcoat (TW-023)	8.9	0.14000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total State Potential Emissions													3.53	0.00	0.00	0.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00
																			Subtotal				4.42

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission (ton/yr)	Toluene Emission (ton/yr)	Methyl Isobutyl Ketone Emission (ton/yr)	Ethyl Benzene Emission (ton/yr)	Napthalene Emissions (ton/yr)	Diphenyl Diisocyanat e Emissions (ton/yr)	Trimethyl Amine Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methyl Ethyl Ketone Emission (ton/yr)
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane											
PN-63																						
Elastomer Adhesive Primer Chemlock 459X	7.2	0.47000	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.86	0.00	0.00	2.96	0.00	0.00	0.00	0.00	0.00
Topcoat (8370A/C)	8.6	0.91000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 11.86 0.00 0.00 2.96 0.00 0.00 0.00 0.00 0.00
Subtotal 14.82

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission (ton/yr)	Toluene Emission (ton/yr)	Methyl Isobutyl Ketone Emission (ton/yr)	Ethyl Benzene Emission (ton/yr)	Napthalene Emissions (ton/yr)	Diphenyl Diisocyanat e Emissions (ton/yr)	Trimethyl Amine Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methyl Ethyl Ketone Emission (ton/yr)
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane											
Honda Line																						
Urethane Coating (HS-34 EX-1)	7.6	0.09000	1.000	9.22%	60.85%	2.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27	1.81	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleanup Solvent (Xylene)	7.0	0.00299	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 0.27 1.81 0.08 0.00 0.00 0.00 0.00 0.00 0.00
Subtotal 2.17

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight %		Weight %		Weight %		Weight %		Xylene Emission (ton/yr)	Toluene Emission (ton/yr)	Methyl Isobutyl Ketone Emission (ton/yr)	Ethyl Benzene Emission (ton/yr)	Napthalene Emissions (ton/yr)	Diphenyl Diisocyanat e Emissions (ton/yr)	Trimethyl Amine Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methyl Ethyl Ketone Emission (ton/yr)
				Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Napthalene	Methylene Diphenyl Diisocyanate	Trimethyl Amine	Hexane											
PN-96/GMT-800 Line																						
Elastomer Adhesive Primer Chemlock 459X	7.2	0.05000	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.26	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00
Topcoat (8370A/C)	8.6	0.05300	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
End Dip (Loc Tite)	7.8	0.02000	1.000	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	10.00%	0.00	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.14	0.07

Total State Potential Emissions 1.26 0.14 0.00 0.32 0.00 0.00 0.00 0.00 0.00
Subtotal 1.92

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Naphthalene	Weight % Methylene Diphenyl Diisocyanate	Weight % Trimethyl Amine	Weight % Hexane	Weight % Methyl Ethyl Ketone	Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Naphthalene	Diphenyl Diisocyanate	Trimethyl Amine	Hexane	Methyl Ethyl Ketone
				Emission (ton/yr)	Emission (ton/yr)								Emission (ton/yr)	Emission (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	
Mercedes 3806																					
Elastomer Adhesive Primer Chemlock 459X	7.2	0.05000	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.26	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00
Topcoat (C41 Mix)	8.6	0.05300	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.90%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00
SafeSolv	6.6	0.29000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 1.26 0.00 0.00 0.32 0.00 0.00 0.02 0.00 0.00
Subtotal 1.59

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Naphthalene	Weight % Methylene Diphenyl Diisocyanate	Weight % Trimethyl Amine	Weight % Hexane	Weight % Methyl Ethyl Ketone	Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Naphthalene	Diphenyl Diisocyanate	Trimethyl Amine	Hexane	Methyl Ethyl Ketone
				Emission (ton/yr)	Emission (ton/yr)								Emission (ton/yr)	Emission (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	
Mercedes 9753																					
Elastomer Adhesive Primer Chemlock 459X	7.2	0.65000	1.000	80.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.40	0.00	0.00	4.10	0.00	0.00	0.00	0.00	0.00
Topcoat (C41 Mix)	8.6	0.45000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.90%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00

Total State Potential Emissions 16.40 0.00 0.00 4.10 0.00 0.00 0.15 0.00 0.00

Control Efficiency:	Limit Usage: Xylene	Limit Usage: Toluene	Limit Usage: Methyl Isobutyl Ketone	Limit Usage: Ethyl Benzene	Limit Usage: Naphthalene	Limit Usage: Diphenyl Diisocyanate	Limit Usage: Trimethyl Amine	Limit Usage: Hexane	Limit Usage: Methyl Ethyl Ketone
VOC 39.63%	9.90	0.00	0.00	2.48	0.00	0.00	0.09	0.00	0.00
	Unlimited Total HAPs 20.65								
	Limited Total HAPs 12.47								

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %		Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Naphthalene	Weight % Methylene Diphenyl Diisocyanate	Weight % Trimethyl Amine	Weight % Hexane	Weight % Methyl Ethyl Ketone	Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl Benzene	Naphthalene	Diphenyl Diisocyanate	Trimethyl Amine	Hexane	Methyl Ethyl Ketone
				Emission (ton/yr)	Emission (ton/yr)								Emission (ton/yr)	Emission (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	Emissions (ton/yr)	
Flock Adhesive																					
Flock Lok 852 Adhesive	8.3	0.13000	1.000	25.00%	0.00%	10.00%	10.00%	0.00%	2.00%	0.00%	0.00%	0.00%	1.18	0.00	0.47	0.47	0.00	0.09	0.00	0.00	0.00
Naptha	7.4	0.03000	1.000	0.00%	0.00%	0.00%	0.00%	13.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.00

Total State Potential Emissions 1.18 0.00 0.47 0.47 0.13 0.09 0.00 0.00 0.00
Subtotal 2.34

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate
From Rubber Extrusion**

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Emission Factors from RMA Maximum Line Capacity		Emission Calculations			
		VOC		PM	
500 lb rubber/hour		lb/hr	tons/year	lb/hr	tons/year
Curing		1.05	4.58	0.00	0.00
Extrusion		0.03	0.13	0.01	0.06
Emission Factors					
Curing	2.09E-03 case for all rubber types)				
Extrusion					
	5.87E-05 case for all rubber types)				
	2.66E-05 case for all rubber types)				
Totals		1.07	4.71	0.01	0.06

HAP Emission Factors		Emission Calculations				
		Rubber Curing		Extrusion		Total HAPs TPY
Curing (emission factors for autoclave with EPDM sulfur cure rubber)		% by weight	Line 3 Oven TPY	% by weight	Line 3 TPY	
6.50E-04	organic/lb rubber processed	1.43E-08	1.46E-08	0.00E+00	0.00E+00	1.46E-08
4.66E-04	processed	5.37E-08	5.48E-08	1.24E-06	5.49E-08	1.10E-07
	processed	2.72E-07	2.78E-07	0.00E+00	0.00E+00	2.78E-07
Extrusion		6.80E-08	6.94E-08	0.00E+00	0.00E+00	6.94E-08
2.62E-05	emission factor for extrusion with EPDM peroxide cure rubber)					
2.02E-05	components from Banbury mills and/or curing %'s)					
	Acetophenone	6.91E-09	7.05E-09	2.13E-04	9.42E-06	9.43E-06
	Aniline	4.13E-09	4.21E-09	1.48E-07	6.55E-09	1.08E-08
	Benzene	0.00E+00	0.00E+00	4.88E-05	2.16E-06	2.16E-06
	Biphenyl	0.00E+00	0.00E+00	3.92E-07	1.73E-08	1.73E-08
	bis-(2-Ethylhexyl)phthalate	0.00E+00	0.00E+00	2.74E-07	1.21E-08	1.21E-08
	Carbon Disulfide	1.50E-05	1.53E-05	0.00E+00	0.00E+00	1.53E-05
	Carbonyl Sulfide	1.20E-05	1.22E-05	0.00E+00	0.00E+00	1.22E-05
	Cumene	5.17E-08	5.28E-08	8.08E-08	3.57E-09	5.63E-08
	Di-n-butylphthalate	4.00E-09	4.08E-09		0.00E+00	4.08E-09
	Ethylbenzene	5.93E-08	6.05E-08		0.00E+00	6.05E-08
	Methylene Chloride	2.58E-07	2.63E-07	3.61E-06	1.60E-07	4.23E-07
	m/p-Xylene	2.33E-07	2.38E-07	4.28E-06	1.89E-07	4.27E-07
	Napthalene	1.46E-08	1.49E-08	1.07E-06	4.73E-08	6.22E-08
	n-Hexane	6.84E-07	6.98E-07	2.66E-04	1.18E-05	1.25E-05
	O-Xylene	8.30E-08	8.47E-08	4.92E-05	2.18E-06	2.26E-06
	Phenol	1.71E-08	1.75E-08	3.41E-07	1.51E-08	3.25E-08
	Styrene	2.21E-08	2.26E-08	4.25E-07	1.88E-08	4.14E-08
	Tetrachloroethene	4.15E-08	4.24E-08	0.00E+00	0.00E+00	4.24E-08
	Toluene	7.05E-07	7.19E-07	4.37E-06	1.93E-07	9.13E-07
Total		2.96E-05	3.02E-05	5.93E-04	2.62E-05	0.00

Methodology: peroxide cure rubber since there were not emission factors for sulfur and the maximum lb of rubber throughput.

**Appendix A: Emissions Calculations
VOC and Particulate
From Rubber Extrusion**

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Emission Factors from RMA Maximum Line Capacity		650 lb rubber/hour		Emission Calculations			
				VOC		PM	
Emission Factors				lb/hr	tons/year	lb/hr	tons/year
Curing				1.05	4.58	0.00	0.00
Extrusion				0.03	0.13	0.01	0.06
Curing		2.09E-03 case for all rubber types)					
Extrusion		5.87E-05 case for all rubber types)					
		2.66E-05 case for all rubber types)					
				VOC		PM	
Totals				1.07	4.71	0.01	0.06

HAP Emission Factors		Emission Calculations					
		Rubber Curing		Extrusion		Total HAPs TPY	
Curing (emission factors for autoclave with EPDM sulfur cure rubber)		HAP	% by weight	Line 3 Oven TPY	% by weight		Line 3 TPY
6.50E-04	organic/lb rubber processed	1,4-Dichlorobenzene	1.43E-08	1.46E-08	0.00E+00	0.00E+00	1.46E-08
4.66E-04	processed	1,3-Butadiene	5.37E-08	5.48E-08	1.24E-06	5.49E-08	1.10E-07
		MEK (2-Butanone)	2.72E-07	2.78E-07	0.00E+00	0.00E+00	2.78E-07
		MIBK	6.80E-08	6.94E-08	0.00E+00	0.00E+00	6.94E-08
Extrusion		Acetophenone	6.91E-09	7.05E-09	2.13E-04	9.42E-06	9.43E-06
2.62E-05	emission factor for extrusion with EPDM peroxide cure rubber)	Aniline	4.13E-09	4.21E-09	1.48E-07	6.55E-09	1.08E-08
2.02E-05	components from Banbury mills and/or curing %s)	Benzene	0.00E+00	0.00E+00	4.88E-05	2.16E-06	2.16E-06
		Biphenyl	0.00E+00	0.00E+00	3.92E-07	1.73E-08	1.73E-08
		bis-(2-Ethylhexyl)phthalate	0.00E+00	0.00E+00	2.74E-07	1.21E-08	1.21E-08
		Carbon Disulfide	1.50E-05	1.53E-05	0.00E+00	0.00E+00	1.53E-05
		Carbonyl Sulfide	1.20E-05	1.22E-05	0.00E+00	0.00E+00	1.22E-05
		Cumene	5.17E-08	5.28E-08	8.08E-08	3.57E-09	5.63E-08
		Di-n-butylphthalate	4.00E-09	4.08E-09		0.00E+00	4.08E-09
		Ethylbenzene	5.93E-08	6.05E-08		0.00E+00	6.05E-08
		Methylene Chloride	2.58E-07	2.63E-07	3.61E-06	1.60E-07	4.23E-07
		m/p-Xylene	2.33E-07	2.38E-07	4.28E-06	1.89E-07	4.27E-07
		Napthalene	1.46E-08	1.49E-08	1.07E-06	4.73E-08	6.22E-08
		n-Hexane	6.84E-07	6.98E-07	2.66E-04	1.18E-05	1.25E-05
		O-Xylene	8.30E-08	8.47E-08	4.92E-05	2.18E-06	2.26E-06
		Phenol	1.71E-08	1.75E-08	3.41E-07	1.51E-08	3.25E-08
		Styrene	2.21E-08	2.26E-08	4.25E-07	1.88E-08	4.14E-08
		Tetrachloroethene	4.15E-08	4.24E-08	0.00E+00	0.00E+00	4.24E-08
		Toluene	7.05E-07	7.19E-07	4.37E-06	1.93E-07	9.13E-07
Total			2.96E-05	3.02E-05	5.93E-04	2.62E-05	0.00

Methodology: rubber since there were not emission factors for sulfur and the maximum lb of rubber throughput.

**Appendix A: Emissions Calculations
VOC and Particulate
From Rubber Extrusion**

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Emission Factors from RMA Maximum Line Capacity		900 lb rubber/hour	Emission Calculations			
			VOC		PM	
			lb/hr	tons/year	lb/hr	tons/year
Emission Factors						
Curing			1.05	4.58	0.00	0.00
Extrusion			0.03	0.13	0.01	0.06
			VOC		PM	
2.09E-03 (case for all rubber types)						
5.87E-05 (case for all rubber types)						
2.66E-05 (case for all rubber types)						
		Totals	1.07	4.71	0.01	0.06

HAP Emission Factors		Emission Calculations					
		Rubber Curing		Extrusion		Total HAPs TPY	
Curing (emission factors for autoclave with EPDM sulfur cure rubber)		HAP	% by weight	Line 3 Oven TPY	% by weight		Line 3 TPY
6.50E-04 organic/lb rubber processed		1,4-Dichlorobenzene	1.43E-08	1.46E-08	0.00E+00	0.00E+00	1.46E-08
4.66E-04 processed		1,3-Butadiene	5.37E-08	5.48E-08	1.24E-06	5.49E-08	1.10E-07
		MEK (2-Butanone)	2.72E-07	2.78E-07	0.00E+00	0.00E+00	2.78E-07
		MIBK	6.80E-08	6.94E-08	0.00E+00	0.00E+00	6.94E-08
Extrusion		Acetophenone	6.91E-09	7.05E-09	2.13E-04	9.42E-06	9.43E-06
2.62E-05 emission factor for extrusion with EPDM peroxide cure rubber)		Aniline	4.13E-09	4.21E-09	1.48E-07	6.55E-09	1.08E-08
2.02E-05 components from Banbury mills and/or curing %s)		Benzene	0.00E+00	0.00E+00	4.88E-05	2.16E-06	2.16E-06
		Biphenyl	0.00E+00	0.00E+00	3.92E-07	1.73E-08	1.73E-08
		bis-(2-Ethylhexyl)phthalate	0.00E+00	0.00E+00	2.74E-07	1.21E-08	1.21E-08
		Carbon Disulfide	1.50E-05	1.53E-05	0.00E+00	0.00E+00	1.53E-05
		Carbonyl Sulfide	1.20E-05	1.22E-05	0.00E+00	0.00E+00	1.22E-05
		Cumene	5.17E-08	5.28E-08	8.08E-08	3.57E-09	5.63E-08
		Di-n-butylphthalate	4.00E-09	4.08E-09		0.00E+00	4.08E-09
		Ethylbenzene	5.93E-08	6.05E-08		0.00E+00	6.05E-08
		Methylene Chloride	2.58E-07	2.63E-07	3.61E-06	1.60E-07	4.23E-07
		m/p-Xylene	2.33E-07	2.38E-07	4.28E-06	1.89E-07	4.27E-07
		Naphthalene	1.46E-08	1.49E-08	1.07E-06	4.73E-08	6.22E-08
		n-Hexane	6.84E-07	6.98E-07	2.66E-04	1.18E-05	1.25E-05
		O-Xylene	8.30E-08	8.47E-08	4.92E-05	2.18E-06	2.26E-06
		Phenol	1.71E-08	1.75E-08	3.41E-07	1.51E-08	3.25E-08
		Styrene	2.21E-08	2.26E-08	4.25E-07	1.88E-08	4.14E-08
		Tetrachloroethene	4.15E-08	4.24E-08	0.00E+00	0.00E+00	4.24E-08
		Toluene	7.05E-07	7.19E-07	4.37E-06	1.93E-07	9.13E-07
		Total	2.96E-05	3.02E-05	5.93E-04	2.62E-05	0.00

Methodology: rubber since there were not emission factors for sulfur and the maximum lb of rubber throughput.

**Appendix A: Emissions Calculations
Process Operations**

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
Title V: 053-5651-00017
Reviewer: Phillip Ritz/EVP
Date: April 1, 1996

Emission Unit	Pollutant	Maximum Rate (lbs/hr)	Emission Factor (lb/lb processed)	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions (tons/yr)	Control Efficiency (%)	Maximum Controlled Emissions (tons/yr)
Line 1 Extrusion	PM	500	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	500	3.52000E-06	0.0018	0.01	0.00%	0.01
	HAPs	500	2.99000E-05	0.0150	0.07	0.00%	0.07
Line 1 Curing	PM	500	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	500	8.25000E-04	0.4125	1.81	0.00%	1.81
	HAPs	500	9.76000E-04	0.4880	2.14	0.00%	2.14
Line 2 Extrusion	PM	500	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	500	3.52000E-06	0.0018	0.01	0.00%	0.01
	HAPs	500	2.99000E-05	0.0150	0.07	0.00%	0.07
Line 2 Curing	PM	500	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	500	8.25000E-04	0.4125	1.81	0.00%	1.81
	HAPs	500	9.76000E-04	0.4880	2.14	0.00%	2.14
Line 3 Extrusion	PM	500	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	500	3.52000E-06	0.0018	0.01	0.00%	0.01
	HAPs	500	2.99000E-05	0.0150	0.07	0.00%	0.07
Line 3 Curing	PM	500	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	500	8.25000E-04	0.4125	1.81	0.00%	1.81
	HAPs	500	9.76000E-04	0.4880	2.14	0.00%	2.14
Line 4 Extrusion	PM	650	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	650	3.52000E-06	0.0023	0.01	0.00%	0.01
	HAPs	650	2.99000E-05	0.0194	0.09	0.00%	0.09
Line 4 Curing	PM	650	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	650	8.25000E-04	0.5363	2.35	0.00%	2.35
	HAPs	650	9.76000E-04	0.6344	2.78	0.00%	2.78
Line 5 Extrusion	PM	650	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	650	3.52000E-06	0.0023	0.01	0.00%	0.01
	HAPs	650	2.99000E-05	0.0194	0.09	0.00%	0.09
Line 5 Curing	PM	650	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	650	8.25000E-04	0.5363	2.35	0.00%	2.35
	HAPs	650	9.76000E-04	0.6344	2.78	0.00%	2.78
Line 6 Extrusion	PM	900	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	900	3.52000E-06	0.0032	0.01	0.00%	0.01
	HAPs	900	2.99000E-05	0.0269	0.12	0.00%	0.12
Line 6 Curing	PM	900	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	900	8.25000E-04	0.7425	3.25	0.00%	3.25
	HAPs	900	9.76000E-04	0.8784	3.85	0.00%	3.85
Line 7 Extrusion	PM	500	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	500	3.52000E-06	0.0018	0.01	0.00%	0.01
	HAPs	500	2.99000E-05	0.0150	0.07	0.00%	0.07
Line 7 Curing	PM	500	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	500	8.25000E-04	0.4125	1.81	0.00%	1.81
	HAPs	500	9.76000E-04	0.4880	2.14	0.00%	2.14
Line 8 Extrusion	PM	900	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	900	3.52000E-06	0.0032	0.01	0.00%	0.01
	HAPs	900	2.99000E-05	0.0269	0.12	0.00%	0.12
Line 8 Curing	PM	900	0.00000E+00	0.0000	0.00	0.00%	0.00
	VOC	900	8.25000E-04	0.7425	3.25	0.00%	3.25
	HAPs	900	9.76000E-04	0.8784	3.85	0.00%	3.85

Notes:

Emission Factors from the Rubber Manufacturers Association's Emission Factors Project

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

**Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant
 Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952
 Title V: 053-5651-00017
 Reviewer: Phillip Ritz/EVP
 Date: April 1, 1996**

Heat Input Capacity Potential Throughput
 MMBtu/hr MMCF/yr

8.4

73.3

two (2) boilers with a total maximum rated heat input of 8.37 mmBtu per hour, identified as Boiler #1 & #2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.28	0.02	3.67	0.20	3.08

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: GenCorp, Inc., Vehicle Sealing Division, Marion Plant

Address City IN Zip: 1700 Factory Avenue, Marion, IN 46952

Title V: 053-5651-00017

Reviewer: Phillip Ritz/EVP

Date: April 1, 1996

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.07	0.00

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00

Methodology is the same as page 1.

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