

**PART 70 OPERATING PERMIT**  
**Office of Air Quality**

**Freudenberg - NOK General Partnership**  
**(Scottsburg I)**  
**821 South Lake Road**  
**Scottsburg, Indiana 47170**

(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.: T143-8936-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:  Expiration Date:

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6(2)]
- B.23 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- C.9 Performance Testing [326 IAC 3-6]

#### Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

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

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - One (1) Rubber Mixer (MIX1)**

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

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.2 Particulate Matter (PM)

**D.2 FACILITY OPERATION CONDITIONS - Two (2) Rubber Post Cure Ovens (RC2 - RC3)**

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

- D.2.1 VOC Limit [326 IAC 8-1-6]
- D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.2.4 VOC Emissions

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

- D.2.5 Record Keeping Requirements
- D.2.6 Reporting Requirements

**Certification**

**Emergency/Deviation Occurrence Report**

**Quarterly Report**

**Semi-Annual Compliance Monitoring Report**

**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 rubber and spring packed seals manufacturing plant.

Responsible Official:	Tom Julian
Source Address:	821 South Lake Road, Scottsburg, IN 47170
Mailing Address:	821 South Lake Road, Scottsburg, IN 47170
SIC Code:	3053
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; 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) Two (2) rubber post-cure ovens, identified as RC2 and RC3, constructed in February 1994, each with a maximum capacity of processing two hundred and forty (240) pounds of rubber per hour, using no control, and exhausting to stacks RC2 and RC3, respectively;
- (b) One (1) rubber mixer, identified as MIX1, constructed in February 1994, with a maximum capacity of processing 1,180 pounds of raw material per hour, with one (1) baghouse for particulate matter control, and exhausting to stack MIX1;
- (c) Six (6) 24-inch transfer molding presses identified as TMP1 through TMP6, with a maximum capacity of forty (40) pounds uncured rubber per hour at each press, exhausting to a stack identified as RC5; and
- (d) Six (6) 24-inch transfer molding presses identified as TMP7 through TMP12, with a maximum capacity of forty (40) pounds uncured rubber per hour at each press, exhausting to a stack identified as RC6.

**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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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) 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.
- (d) 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.
- (e) 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.

- (f) 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).
- (g) 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)]
- (h) 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(2)] [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 to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) 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, 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 **Stack Height [326 IAC 1-7]**  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.
- C.8 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- 
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
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.9 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.10 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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.11 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.12 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.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

**C.14 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 2, 1997.
- (b) 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.
- (c) 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.15 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 by the date provided in 40 CFR 68.10(a); 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); and

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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters

established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;

- (3) An automatic measurement was taken when the process was not operating;
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 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.18 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] [326 IAC 2-7-19 (e)]**

---

- (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 and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (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
- The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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.

**C.19 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.20 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 semi-annual 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 not 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.21 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)]:** One (1) rubber mixer, identified as MIX1, with a maximum capacity of processing 1,180 pounds of raw material per hour, with one (1) baghouse for particulate matter control, and exhausting to stack MIX1.  
(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the rubber mixer (MIX1) 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:

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

$$E = 4.10 (0.59)^{0.67} = 2.88 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the mixing of rubber shall be limited to 2.88 pounds per hour.

### Compliance Determination Requirements

#### D.1.2 Particulate Matter (PM)

In order to comply with D.1.1, the baghouse for PM control shall be in operation and control emissions from the rubber mixer (MIX1) at all times when the rubber mixer is in operation.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** Two (2) rubber post-cure ovens, identified as RC2 and RC3, each with a maximum capacity of processing two hundred and forty (240) pounds of rubber per hour, using no control, and exhausting to stacks RC2 and RC3, respectively;  
(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 VOC Limitation [326 IAC 8-1-6]

This facility shall limit the amount of post cured rubber to one million (1,000,000) pounds per twelve consecutive month period. This usage limit will limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period based on a VOC emission factor of 0.0249 lb/lb rubber post cured. Compliance with this limit makes 326 IAC 8-1-6 (General reduction; new facilities) (BACT) not applicable.

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

Pursuant to 326 IAC 6-3-2, the PM from the rubber curing ovens (RC1, RC2, RC3 and RC4) 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:

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

$$E = 4.10 (0.057)^{0.67} = 0.60 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the mixing of rubber shall be limited to 0.60 pounds per hour.

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

**D.2.5 Record Keeping Requirements**

---

- (d) To document compliance with Condition D.2.1, the Permittee shall maintain records of monthly post cured rubber production from curing ovens RC2 and RC3.
  
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.6 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.2.1 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT**  
**CERTIFICATION**

Source Name: Freudenberg - NOK General Partnership (Scottsburg I)  
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170  
Mailing Address: P.O. Box 427, Scottsburg, Indiana 47170  
Part 70 Permit No.: T143-8936-00010

**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 Affidavit (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: Freudenberg - NOK General Partnership (Scottsburg I)  
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170  
Mailing Address: P.O. Box 427, Scottsburg, Indiana 47170  
Part 70 Permit No.: T143-8936-00010

**This form consists of 2 pages**

**Page 1 of 2**

<b>9</b>	This is an emergency as defined in 326 IAC 2-7-1(12)
<b>C</b>	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); and
<b>C</b>	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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

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

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: Freudenberg - NOK General Partnership (Scottsburg I)  
 Source Address: 821 South Lake Road, Scottsburg, Indiana 47170  
 Mailing Address: P.O. Box 427, Scottsburg, Indiana 47170  
 Part 70 Permit No.: T143-8936-00010  
 Facility: Rubber post cure ovens (RC1, RC2, RC3, and RC4)  
 Parameter: VOC  
 Limit: 1,000,000 lbs post cured rubber per year (less than 25 tons VOC per 12 consecutive month period) based on VOC emission factor of 0.0249 lb/lb rubber post cured.

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

Month	Column 1	Column 2	Column 1 + Column 2
	Post cured rubber produced This Month	Post cured rubber produced Previous 11 Months	Post cured rubber produced 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: Freudenberg - NOK General Partnership (Scottsburg 1)  
Source Address: 821 South Lake Road, Scottsburg, Indiana 47170  
Mailing Address: P.O. Box 427, Scottsburg, Indiana 47170  
Part 70 Permit No.: T143-8936-00010

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

Page 1 of 2

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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Freudenberg - NOK General Partnership (Scottsburg I)  
Source Location: 821 South Lake Road, Scottsburg, Indiana 47170  
County: Scott  
SIC Code: 3053  
Operation Permit No.: T143-8936-00010  
Permit Reviewer: Linda Quigley/EVP

On December 10, 2000, the Office of Air Quality (OAQ) had a notice published in the Scott County Journal, Scottsburg, Indiana, stating that Freudenberg - NOK General Partnership (Scottsburg I) had applied for a Part 70 Operating Permit to operate a rubber and spring packed seals manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation 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.

The Part 70 permit has been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

## 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:** Freudenberg - NOK General Partnership (Scottsburg I)  
**Source Location:** 821 South Lake Road, Scottsburg, IN 47170  
**County:** Scott  
**SIC Code:** 3053  
**Operation Permit No.:** T143-8936-00010  
**Permit Reviewer:** Linda Quigley/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Freudenberg - NOK General Partnership relating to the operation of a rubber and spring packed seals manufacturing plant.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) rubber post-cure ovens, identified as RC2 and RC3, each with a maximum capacity of processing two hundred and forty (240) pounds of rubber per hour, using no control, and exhausting to stacks RC2 and RC3, respectively;
- (b) One (1) rubber mixer, identified as MIX1, with a maximum capacity of processing 1,180 pounds of raw material per hour, with one (1) baghouse for particulate matter control, and exhausting to stack MIX1;
- (c) Six (6) 24-inch transfer molding presses identified as TMP1 through TMP6, with a maximum capacity of forty (40) pounds uncured rubber per hour at each press, exhausting to a stack identified as RC5; and
- (d) Six (6) 24-inch transfer molding presses identified as TMP7 through TMP12, with a maximum capacity of forty (40) pounds uncured rubber per hour at each press, exhausting to a stack identified as RC6.

*Notes: Freudenberg - NOK has accepted a plant-wide limit of 1,000,000 pounds of rubber post-cured per year.*

*Two (2) rubber post-cure ovens, identified as RC1 and RC4, have been removed from the facility.*

## Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating 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) One hundred and twenty-five (125) miscellaneous compression/transfer rubber molding presses, each emitting four (4) pounds per day of a single HAP;
- (b) One (1) Farrell Strainer/Extruder, emitting four (4) pounds per day of a single HAP;
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
  - (1) One (1) natural gas fired HVAC unit, with a maximum rating of 0.5 million British thermal units (MMBtu) per hour;
  - (2) Six (6) natural gas fired space heaters, each with a maximum rating of 0.4 MMBtu per hour.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (g) Three (3) phosphating tanks, each with a capacity of one hundred (100) gallons, used for cleaning, rinsing, and phosphatizing metal inserts. *Note: These tanks do not contain any VOC or HAPs;*
- (h) Closed loop heating and cooling systems;
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (k) Heat exchanger cleaning and repair;
- (l) Process vessel degassing and cleaning to prepare for internal repairs;
- (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 emissions from those activities would not be associated with any production process;
- (o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

- (q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
- (r) Filter or coalescer media change-out; and
- (s) A laboratory as defined in 326 IAC 2-7-1(20)C.

### **Existing Approvals**

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

- (a) Registration 143-10230-00010, issued on November 5, 1998;
- (b) Exemption 143-8659-00010, issued on July 23, 1997; and
- (c) Registration 143-3308-00010, issued on February 18, 1994;
- (b) Registration, issued on July 12, 1989.

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 September 2, 1997.

A notice of completeness letter was mailed to the source on September 16, 1997.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 - 7).

### **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	72.77
PM-10	72.87
SO <sub>2</sub>	0.00
VOC	58.28
CO	1.10
NO <sub>x</sub>	1.30

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)
Carbon Disulfide	91.25
Hexane	7.19
TOTAL	121.04

Note: This table reflects the two (2) worst case single HAPs. See Appendix A for a list of all single HAP emissions. The TOTAL in this table is the combined total of all HAPs listed in Appendix A.

- (a) 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.

**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	0.12
PM-10	0.12
SO <sub>2</sub>	--
VOC	0.20
CO	--
NO <sub>x</sub>	--
HAP (specify)	--

**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	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
Rubber Oven Curing (RC2 - RC3)	0.34	0.34	0.00	12.45	0.00	0.00	1.39	5.86
Rubber Mixer (MIX1)	0.70	0.70	0.00	2.30	0.00	0.00	0.58	2.60
Rubber Molding Presses (TMP1 - TMP12)	1.05	1.05	0.00	3.53	0.00	0.00	0.93	1.13
Natural Gas Combustion	0.00	0.10	0.00	0.10	0.10	1.30	0.00	0.00
Insignificant Activities	0.00	0.00	0.00	0.00	0.00	0.00	91.25	92.71
<b>Total Emissions</b>	<b>2.09</b>	<b>2.19</b>	<b>0.00</b>	<b>18.38</b>	<b>0.10</b>	<b>1.30</b>	<b>91.25</b>	<b>102.30</b>

*Note: Limited Potential to Emit is based on a maximum rate of 1,000,000 pounds of rubber post-cured per year. Therefore, 326 IAC 8-1-6 does not apply.*

**County Attainment Status**

The source is located in Scott County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Scott County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## 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.
- (b) 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 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on September 2, 1997. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

### 326 IAC 2-2 (PSD Minor Limit)

Since the potential to emit VOC and PM is less than one hundred tons per year and since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-2 does not apply.

### 326 IAC 2-6 (Emission Reporting)

This source is located in Scott County and the potential to emit VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

### 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 2-4.1-1 (New Source Toxics Control)

This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of combination of HAPs greater than or equal to twenty-five (25) tons per year. Since this facility was constructed prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 do not apply.

#### 326 IAC 6-3-2 (Process Operations)

- (c) The particulate matter (PM) from the rubber mixer, identified as MIX1, 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:

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

$$E = 4.10 (0.59)^{0.67} = 2.88 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the mixing of rubber shall be limited to 2.88 pounds per hour.

Compliance calculation:

$$(70.3 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 16.05 \text{ lbs PM/hr}$$

Controlled Compliance calculation:

$$(0.70 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.16 \text{ lbs PM/hr}$$

The baghouse shall be in operation at all times the rubber mixer is in operation, in order to comply with this limit.

- (d) The particulate matter (PM) from the rubber curing ovens, identified as RC2 and RC3, 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:

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

$$E = 4.10 (0.057)^{0.67} = 0.60 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from rubber curing shall be limited to 0.60 pounds per hour.

Compliance calculation:

$$(0.34 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.078 \text{ lbs PM/hr}$$

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

This rule applies to new facilities as of January 1, 1980, which have the potential to emit twenty-five (25) tons or more per year of VOC. This source will limit VOC emissions to less than twenty-five (25) tons per year by limiting rubber post cured to one million (1,000,000) pounds per twelve (12) consecutive month period based on a VOC emission factor of 0.0249 lb/lb of rubber post cured. Therefore, the provisions of 326 IAC 8-1-6 do not apply.

### 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.

## **Conclusion**

The operation of this rubber and spring-packed seals manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T143-8936-00010**.

**Appendix A: Emission Calculations**

**Company Name:** Freudenberg - NOK General Partnership (Scottsburg I)  
**Address City IN Zip:** 821 South Lake Road, Scottsburg, IN 47170  
**TV:** 143-8936  
**Pit ID:** 143-00010  
**Reviewer:** Linda Quigley/EVP  
**Date:** August 22, 2000

<b>Uncontrolled Potential Emissions (tons/year)</b>						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Rubber Oven Curing RC2 - RC3	Rubber Mixer	Rubber Injection Molding Press Operations	Insignificant Activities	TOTAL
PM	0.00	1.42	70.30	1.05	0.00	72.77
PM10	0.10	1.42	70.30	1.05	0.00	72.87
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	1.30	0.00	0.00	0.00	0.00	1.30
VOC	0.10	52.35	2.30	3.53	0.00	58.28
CO	1.10	0.00	0.00	0.00	0.00	1.10
total HAPs	0.00	24.60	2.60	1.13	92.71	121.04
worst case single HAP	0.00	5.84	0.58	0.93	91.25	91.25
Total emissions based on rated capacity at 8,760 hours/year.						
<b>Controlled Potential Emissions (tons/year)</b>						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Rubber Oven Curing RC2 - RC3	Rubber Mixer	Rubber Injection Molding Press Operations	Insignificant Activities	TOTAL
PM	0.00	0.34	0.70	1.05	0.00	2.09
PM10	0.10	0.34	0.70	1.05	0.00	2.19
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	1.30	0.00	0.00	0.00	0.00	1.30
VOC	0.10	12.45	2.30	3.53	0.00	18.38
CO	0.10	0.00	0.00	0.00	0.00	0.10
total HAPs	0.00	5.86	2.60	1.13	92.71	102.30
worst case single HAP	0.00	1.39	0.58	0.93	91.25	91.25
Total emissions based on rated capacity at 8,760 hours/year, after control.						

## VOC and HAP Emissions

## Rubber Oven Curing (RC2 - RC3)

Company Name: Freudenberg - NOK General Partnership (Scottsburg I)  
 Address City IN Zip: 821 South Lake Road, Scottsburg, IN 47170  
 TV: 143-8936  
 Plant ID: 143-00010  
 Reviewer: Linda Quigley/EVP  
 Date: August 22, 2000

Pollutant	Max. Rate (lb/yr)	E.F. (lb/lb)	Emission Rate (lb/yr)	Total emissions (ton/yr)	Limited PTE (ton/yr)
<b>VOC</b>	4,204,800	2.49E-02	1.047E+05	<b>5.235E+01</b>	1.245E+01
<b>PM</b>	4,204,800	6.75E-04	2.838E+03	<b>1.419E+00</b>	3.375E-01
<b>HAPs</b>					
1,1,1-Trichloroethane	4,204,800	1.80E-05	7.569E+01	3.78E-02	9.000E-03
1,1 Dichloroethene	4,204,800	1.35E-05	5.676E+01	2.84E-02	6.750E-03
1,3-Butadiene	4,204,800	1.15E-05	4.836E+01	2.42E-02	5.750E-03
2,4-Dinitrophenol	4,204,800	3.98E-07	1.674E+00	8.37E-04	1.990E-04
2-Butanone	4,204,800	1.46E-04	6.139E+02	3.07E-01	7.300E-02
2-Chloroacetophenone	4,204,800	1.34E-08	5.634E-02	2.82E-05	6.700E-06
2-Methylphenol	4,204,800	2.13E-06	8.956E+00	4.48E-03	1.065E-03
4-Methyl-2-Pentanone	4,204,800	7.54E-04	3.170E+03	1.59E+00	3.770E-01
4-Nitrophenol	4,204,800	2.44E-07	1.026E+00	5.13E-04	1.220E-04
Acetaldehyde	4,204,800	1.71E-05	7.190E+01	3.60E-02	8.550E-03
Acetonitrile	4,204,800	1.14E-05	4.793E+01	2.40E-02	5.700E-03
Acetophenone	4,204,800	2.13E-04	8.956E+02	4.48E-01	1.065E-01
Acrolein	4,204,800	2.03E-05	8.536E+01	4.27E-02	1.015E-02
Acrylonitrile	4,204,800	2.89E-04	1.215E+03	6.08E-01	1.445E-01
Aniline	4,204,800	1.26E-05	5.298E+01	2.65E-02	6.300E-03
Benzene	4,204,800	4.88E-05	2.052E+02	1.03E-01	2.440E-02
Benzidine	4,204,800	4.44E-07	1.867E+00	9.33E-04	2.220E-04
Biphenyl	4,204,800	3.96E-06	1.665E+01	8.33E-03	1.980E-03
bis(2-Ethylhexyl)phthalate	4,204,800	1.82E-05	7.653E+01	3.83E-02	9.100E-03
Bromoform	4,204,800	6.85E-06	2.880E+01	1.44E-02	3.425E-03
Bromomethane	4,204,800	1.39E-06	5.845E+00	2.92E-03	6.950E-04
Carbon Disulfide	4,204,800	2.52E-03	1.060E+04	5.30E+00	1.260E+00
Carbon Tetrachloride	4,204,800	1.15E-03	4.836E+03	2.42E+00	5.750E-01
Carbonyl Sulfide	4,204,800	2.79E-04	1.173E+03	5.87E-01	1.395E-01
Chloroethane	4,204,800	4.19E-05	1.762E+02	8.81E-02	2.095E-02
Chloroform	4,204,800	1.60E-05	6.728E+01	3.36E-02	8.000E-03
Chloromethane	4,204,800	2.18E-05	9.166E+01	4.58E-02	1.090E-02
Cumene	4,204,800	7.82E-05	3.288E+02	1.64E-01	3.910E-02
Di-n-butylphthalate	4,204,800	8.22E-06	3.456E+01	1.73E-02	4.110E-03
Dibenzofuran	4,204,800	3.29E-06	1.383E+01	6.92E-03	1.645E-03
Dimethylaminoazobenzene	4,204,800	4.03E-07	1.695E+00	8.47E-04	2.015E-04
Dimethylphthalate	4,204,800	3.87E-07	1.627E+00	8.14E-04	1.935E-04
Ethyl Acrylate	4,204,800	1.16E-04	4.878E+02	2.44E-01	5.800E-02
Ethylbenzene	4,204,800	1.06E-04	4.457E+02	2.23E-01	5.300E-02
Hexachlorobenzene	4,204,800	2.29E-07	9.629E-01	4.81E-04	1.145E-04
Hexachloroethane	4,204,800	3.03E-05	1.274E+02	6.37E-02	1.515E-02
<b>Hexane (c)</b>	4,204,800	<b>2.78E-03</b>	<b>1.169E+04</b>	<b>5.84E+00</b>	1.390E+00
Hydroquinone	4,204,800	1.99E-05	8.368E+01	4.18E-02	9.950E-03
Isooctane	4,204,800	1.89E-05	7.947E+01	3.97E-02	9.450E-03
Isophorone	4,204,800	1.63E-05	6.854E+01	3.43E-02	8.150E-03
m-Xylene	4,204,800	1.33E-06	5.592E+00	2.80E-03	6.650E-04
m-Xylene + p-Xylene	4,204,800	3.55E-04	1.493E+03	7.46E-01	1.775E-01
Methylene Chloride	4,204,800	9.51E-04	3.999E+03	2.00E+00	4.755E-01
N,N-Dimethylaniline	4,204,800	1.26E-06	5.298E+00	2.65E-03	6.300E-04
Naphthalene	4,204,800	7.59E-06	3.191E+01	1.60E-02	3.795E-03
Nitrobenzene	4,204,800	4.97E-07	2.090E+00	1.04E-03	2.485E-04
o-Toluidine	4,204,800	5.50E-06	2.313E+01	1.16E-02	2.750E-03
o-Xylene	4,204,800	1.9E-04	7.989E+02	3.99E-01	9.500E-02
p-Xylene	4,204,800	2.53E-05	1.064E+02	5.32E-02	1.265E-02
Pentachlorophenol	4,204,800	3.08E-07	1.295E+00	6.48E-04	1.540E-04
Phenol	4,204,800	3.13E-05	1.316E+02	6.58E-02	1.565E-02
Propanal	4,204,800	8.19E-05	3.444E+02	1.72E-01	4.095E-02
Propylene Oxide	4,204,800	1.72E-04	7.232E+02	3.62E-01	8.600E-02
Styrene	4,204,800	1.05E-04	4.415E+02	2.21E-01	5.250E-02
Substituted Quinoline	4,204,800	1.23E-04	5.172E+02	2.59E-01	6.150E-02
t-Butyl Methyl Ether	4,204,800	1.97E-04	8.283E+02	4.14E-01	9.850E-02
Tetrachloroethene	4,204,800	1.01E-04	4.247E+02	2.12E-01	5.050E-02
Toluene	4,204,800	5.68E-04	2.388E+03	1.19E+00	2.840E-01
Trichloroethene	4,204,800	5.46E-06	2.296E+01	1.15E-02	2.730E-03
Vinyl Chloride	4,204,800	3.24E-07	1.362E+00	6.81E-04	1.620E-04
			<b>Total HAPs</b>	<b>2.46E+01</b>	<b>5.86E+00</b>

## Methodology

Emission factors taken from the study completed for the Rubber Manufacturers Association (RMA), 9/96; emission factors shown represent worse-case rubber on a pollutant-by-pollutant basis.

Emission factors are provided by the applicant (PM emission factor developed by applicant).

Potential emissions in tons per year = maximum production rate (4,204,800 lbs/yr) \* e.f. (lb/lb)/2000

Limited Potential to Emit is based on a maximum rate of 1,000,000 pounds of post cured rubber per year.

Hexane is the worst case single HAP (in bold).

## Appendix A: Emission Calculations

## VOC and HAP Emissions

## Rubber Mixer

Company Name: Freudenberg - NOK General Partnership (Scottsburg I)  
 Address City IN Zip: 821 South Lake Road, Scottsburg, IN 47170  
 TV: 143-8936  
 Plant ID: 143-00010  
 Reviewer: Linda Quigley/EVP  
 Date: August 22, 2000

Pollutant	Max. Rate (lb/yr)	E.F. (lb/lb)	Emission Rate (lb/yr)	Total emissions (ton/yr)
<b>VOC</b>	10,336,800	4.44E-04	4.590E+03	<b>2.295E+00</b>
<b>PM</b>	10,336,800		1.406E+05	<b>7.03E+01</b>
<b>HAPs</b>				
1,1,1-Trichloroethane	10,336,800	7.31E-07	7.556E+00	3.78E-03
1,1 Dichloroethene	10,336,800	5.47E-07	5.654E+00	2.83E-03
1,3-Butadiene	10,336,800	4.67E-07	4.827E+00	2.41E-03
1,4-Dichlorobenzene	10,336,800	4.48E-09	4.631E-02	2.32E-05
2,4-Dinitrophenol	10,336,800	1.62E-08	1.675E-01	8.37E-05
2-Butanone	10,336,800	5.91E-06	6.109E+01	3.05E-02
2-Chloroacetophenone	10,336,800	5.46E-10	5.644E-03	2.82E-06
2-Methylphenol	10,336,800	8.64E-08	8.931E-01	4.47E-04
4-Methyl-2-Pentanone	10,336,800	3.06E-05	3.163E+02	1.58E-01
4-Nitrophenol	10,336,800	9.90E-09	1.023E-01	5.12E-05
Acetaldehyde	10,336,800	6.95E-07	7.184E+00	3.59E-03
Acetaldehyde + Isobutane	10,336,800	6.12E-07	6.326E+00	3.16E-03
Acetonitrile	10,336,800	4.63E-07	4.786E+00	2.39E-03
Acetophenone	10,336,800	2.32E-06	2.398E+01	1.20E-02
Acrolein	10,336,800	8.26E-07	8.538E+00	4.27E-03
Acrylonitrile	10,336,800	1.17E-05	1.209E+02	6.05E-02
Aniline	10,336,800	5.13E-07	5.303E+00	2.65E-03
Benzene	10,336,800	6.61E-07	6.833E+00	3.42E-03
Benzidine	10,336,800	1.80E-08	1.861E-01	9.30E-05
Biphenyl	10,336,800	5.63E-08	5.820E-01	2.91E-04
bis(2-Ethylhexyl)phthalate	10,336,800	7.40E-07	7.649E+00	3.82E-03
Bromotorm	10,336,800	2.78E-07	2.874E+00	1.44E-03
Bromomethane	10,336,800	5.62E-08	5.809E-01	2.90E-04
Cadmium (Cd) Cpounds	10,336,800	9.35E-09	9.665E-02	4.83E-05
Carbon Disulfide	10,336,800	1.03E-04	1.065E+03	5.32E-01
Carbon Tetrachloride	10,336,800	4.68E-05	4.838E+02	2.42E-01
Carbonyl Sulfide	10,336,800	2.24E-05	2.315E+02	1.16E-01
Chloroethane	10,336,800	1.70E-06	1.757E+01	8.79E-03
Chloroform	10,336,800	6.51E-07	6.729E+00	3.36E-03
Chloromethane	10,336,800	8.86E-07	9.158E+00	4.58E-03
Chromium (Cr) Compounds	10,336,800	1.23E-07	1.271E+00	6.36E-04
Cumene	10,336,800	3.17E-06	3.277E+01	1.64E-02
Di-n-butylphthalate	10,336,800	3.34E-07	3.452E+00	1.73E-03
Dibenzoturan	10,336,800	3.42E-08	3.535E-01	1.77E-04
Dimethylaminoazobenzene	10,336,800	1.64E-08	1.695E-01	8.48E-05
Dimethylphthalate	10,336,800	1.57E-08	1.623E-01	8.11E-05
Ethyl Acrylate	10,336,800	4.73E-06	4.889E+01	2.44E-02
Ethylbenzene	10,336,800	4.32E-06	4.465E+01	2.23E-02
Hexachlorobenzene	10,336,800	9.29E-09	9.603E-02	4.80E-05
Hexachloroethane	10,336,800	1.23E-06	1.271E+01	6.36E-03
<b>Hexane (c)</b>	10,336,800	<b>1.13E-04</b>	<b>1.168E+03</b>	<b>5.84E-01</b>
Hydroquinone	10,336,800	2.62E-05	2.708E+02	1.35E-01
Isocotane	10,336,800	7.94E-07	8.207E+00	4.10E-03
Isophorone	10,336,800	6.63E-07	6.853E+00	3.43E-03
Lead (Pb) Compounds	10,336,800	2.03E-08	2.098E-01	1.05E-04
m-Xylene + p-Xylene	10,336,800	1.44E-05	1.488E+02	7.44E-02
Methylene Chloride	10,336,800	3.86E-05	3.990E+02	2.00E-01
N-Nitrosodimethylamine	10,336,800	2.34E-09	2.419E-02	1.21E-05
Naphthalene	10,336,800	3.08E-07	3.184E+00	1.59E-03
Nickel (Ni) Compounds	10,336,800	9.53E-08	9.851E-01	4.93E-04
Nitrobenzene	10,336,800	2.02E-08	2.088E-01	1.04E-04
o- Iouidine	10,336,800	2.23E-07	2.305E+00	1.15E-03
o-Xylene	10,336,800	7.73E-06	7.990E+01	4.00E-02
Pentachlorophenol	10,336,800	1.25E-08	1.292E-01	6.46E-05
Phenol	10,336,800	1.27E-06	1.313E+01	6.56E-03
Propanal	10,336,800	3.33E-06	3.442E+01	1.72E-02
Propylene Oxide	10,336,800	6.97E-06	7.205E+01	3.60E-02
Styrene	10,336,800	4.25E-06	4.393E+01	2.20E-02
t-Butyl Methyl Ether	10,336,800	7.98E-06	8.249E+01	4.12E-02
Tetrachloroethene	10,336,800	4.10E-06	4.238E+01	2.12E-02
Iouene	10,336,800	2.31E-05	2.388E+02	1.19E-01
Trichloroethene	10,336,800	2.22E-07	2.295E+00	1.15E-03
Vinal Acetate	10,336,800	2.35E-06	2.429E+01	1.21E-02
Vinyl Chloride	10,336,800	1.32E-08	1.364E-01	6.82E-05
			<b>Total HAPs</b>	<b>2.60E+00</b>

## Methodology

Emission factors taken from the study completed for the Rubber Manufacturers Association (RMA), 9/96; emission factors shown represent worst case rubber on a pollutant-by-pollutant basis

Emission Factors provided by the applicant.

Potential emissions in tons per year = maximum production rate (10,336,800 lbs/yr) \* e.f. (lb/lb)/2000

Hexane is the worst case single HAP (in bold).

PM potential to emit provided by applicant.

**Appendix A: Emission Calculations**

**VOC and HAP Emissions  
From Natural Rubber Injection Molding Press Operations**

**Company Name: Freudenberg - NOK General Partnership (Scottsburg I)**  
**Address City IN Zip: 821 South Lake Road, Scottsburg, IN 47170**  
**TV: 143-8936**  
**Plant ID: 143-00010**  
**Reviewer: Linda Quigley/EVP**  
**Date: August 22, 2000**

Pollutant	Max. Rate (lb/hr)	No. of Press	E.F. (lb/lb)	Emission Rate (lb/hr)	Total emissions (ton/yr)
<b>PM</b>				0.240	<b>1.051</b>
<b>VOC</b>	40	12	1.68E-03	0.806	<b>3.532</b>
<b>HAPs</b>					
Acetaldehyde	40	12	7.60E-06	0.004	0.016
Acetonitrile	40	12	6.10E-06	0.003	0.013
Acetophenone	40	12	4.40E-04	0.211	0.925
Acrylonitrile	40	12	6.10E-06	0.003	0.013
Aniline	40	12	2.00E-07	0.000	0.000
Benzene	40	12	1.20E-06	0.001	0.003
Benzidine	40	12	8.00E-08	0.000	0.000
Biphenyl	40	12	9.00E-08	0.000	0.000
s(2-ethylhexyl) phthalate	40	12	2.60E-06	0.001	0.005
1,3 Butadiene	40	12	7.50E-06	0.004	0.016
Carbondisulfide	40	12	4.20E-06	0.002	0.009
Carbonyl sulfide	40	12	3.80E-06	0.002	0.008
Cumene	40	12	2.80E-06	0.001	0.006
Dibenzofuran	40	12	6.90E-08	0.000	0.000
Dibutylphthalate	40	12	7.20E-06	0.003	0.015
Dimethylphthalate	40	12	7.00E-08	0.000	0.000
Ethylbenzene	40	12	1.10E-06	0.001	0.002
Ethylchloride	40	12	3.10E-06	0.001	0.007
Hexachlorobutadiene	40	12	3.90E-07	0.000	0.001
Hexane	40	12	1.60E-05	0.008	0.034
Methylchloroform	40	12	4.20E-06	0.002	0.009
Methyl Ethyl Ketone	40	12	3.00E-06	0.001	0.006
MIBK	40	12	3.10E-06	0.001	0.007
Methyl Chloride	40	12	5.00E-08	0.000	0.000
Napthalene	40	12	4.00E-06	0.002	0.008
Phenol	40	12	1.30E-06	0.001	0.003
Propylene Oxide	40	12	6.10E-06	0.003	0.013
Tetrachloroethylene	40	12	3.10E-06	0.001	0.007
2,4 Toluenediamine	40	12	2.30E-07	0.000	0.000
o-Toludine	40	12	1.50E-07	0.000	0.000
1,2,4 Trichlorobenzene	40	12	2.00E-07	0.000	0.000
o-Xylene	40	12	1.70E-06	0.001	0.004
<b>Total HAPs (tons/year)</b>					<b>1.130</b>

**Methodology**

Emission factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), PM emissions estimated as 1 lb/ton: PM emissions rate = 1 lb/ton \* 0.24 tons (from 12 presses @ 40 lbs/hr) per hr = 0.24 lb/hr Emission factors provided by the applicant.

Potential Emissions in tons per year = Maximum production rate (lbs/hr) \* e.f. (lb/lb) 8 4.38

Potential (PM) emissions = emission rate (lb/hr) \* 4.38

**Appendix A: Emission Calculations**  
**HAP Emissions**  
**Insignificant Activities**

**Company Name:** Freudenberg - NOK General Partnership  
**Address City IN Zip:** 821 South Lake Road, Scottsburg, IN 47170  
**TV:** 143-8936  
**Plant ID:** 143-00010  
**Reviewer:** Linda Quigley/EVP  
**Date:** August 22, 2000

Unit Description	Number of Units	Single HAP	Emission Rate (lb/day)	Total emissions (ton/yr)
Miscellaneous compression/transfer rubber molding presses	125	Carbon Disulfide	4	91.25
Farrell Strainer/Extruder	1	Carbon Disulfide	4	0.73
		Hexane	4	0.73
			<b>Total HAPs =</b>	92.71

Note: Freudenberg - NOK General Partnership did not supply detailed emission information on the above insignificant activities. The above units were listed on form GSD-10(a) with the following Note: *The emission units listed in 52 and 53 emit very small quantities of numerous HAPs. Individual HAPs with the potential to emit greater than 1 pound per day are listed (above); the potential to emit for the remaining HAPs is less than 1 pound per day per emission unit.*

For the purposes of determining potential to emit, the upper limit for single HAP was used (less than 5 pounds/day).

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Space Heaters and HVAC Unit**

**Company Name: Freudenberg - NOK General Partnership (Scottsburg I)**

**Address City IN Zip: 821 South Lake Road, Scottsburg, IN 47170**

**TV: 143-8936**

**Plt ID: 143-00010**

**Reviewer: Linda Quigley/EVP**

**Date: August 22, 2000**

Heat Input Capacity		Potential Throughput
MMBtu/hr	Number of Units	MMCF/yr
0.5	1	4.4
0.4	6	21.0
Total =		25.40

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	0.0	0.1	0.0	1.3	0.1	1.1

\*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

See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Space Heaters and HVAC Unit****HAPs Emissions****Company Name: Freudenberg - NOK General Partnership (Scottsburg I)****Address City IN Zip: 821 South Lake Road, Scottsburg, IN 47170****CP: 143-8936****Pit ID: 143-00010****Reviewer: Linda Quigley/EVP****Date: August 22, 2000****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	2.667E-05	1.524E-05	9.527E-04	2.286E-02	4.319E-05

**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	6.351E-06	1.397E-05	1.778E-05	4.827E-06	2.667E-05

Methodology is the same as page 6.

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