

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Jasper Rubber Products, Inc.  
1010 First Avenue  
Jasper, Indiana 47546**

(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 2-8 and 326 IAC 2-1-3.2, 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.: F037-9390-00040	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary rubber and plastic seal, gasket and custom form manufacturing source.

Responsible Official: Max McCune  
Source Address: 1010 First Avenue, Jasper, Indiana 47546  
Mailing Address: 1010 First Avenue, Jasper, Indiana 47546  
SIC Code: 3069/3089  
County Location: Jasper  
County Status: Secondary Nonattainment for TSP in Bainbridge Township  
Attainment for all other criteria pollutants  
Source Status: Minor Source, FESOP Program

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

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

- (1) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU1, rated at 8.37 MMBtu/hr heat input, with no controls, and exhausting to stack 2001.
- (2) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU2, rated at 10.5 MMBtu/hr heat input, with no controls, and exhausting to stack 2002.
- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 4,537 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber for particulate control, and exhausting to stack 7022.
- (4) Three (3) cutting and grinding operations, identified as EU4, EU5 and EU6, consisting of 20 grinding machines and 3 cutting/grinding machines, with a maximum capacity of 1,800 lbs/hr each, using cyclone dust collectors in series with baghouses for particulate control, with flow rates of 8,000 cfm, 8,000 cfm and 1,500 cfm respectively, and exhausting to stacks 4131, 4158 and 4159.
- (5) One (1) mandreling/vulcanizing operation, identified as EU 3, consisting of 1 dusting table and 1 dusting booth, with a maximum capacity of 1,800 lbs/hr and a flow rate of 11,000 cfm, using a baghouse for particulate control, and exhausting to stack 4130.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight

- 3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month
- 4) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons
- 5) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids
- 6) Filing drums, pails, or other packaging containers with lubricating oils, waxes, and greases
- 7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings
- 8) Machining where an aqueous cutting coolant continuously floods the machining surface
- 9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- 10) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius; the use of which for all cleaners combined does not exceed 145 gallons per 12 months
- 11) Closed loop heating and cooling systems
- 12) Natural draft cooling towers not regulated under a NESHAP
- 13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
- 14) Heat exchanger cleaning and repair
- 15) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone
- 16) 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.
- 17) Mold release agents using low volatile products
- 18) A laboratory as defined in 326 IAC 2-7-1(20)(C)
- 19) Activities emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, including striping for product identification and bonding agents.
- 20) Activities emitting less than or equal to 3.0 pounds per hour or 15 pounds per day of volatile organic compounds (VOC) or 5.0 pounds per hour or 25 pounds per day of particulate matter including a spray booth, post cure and curing ovens and injection

molding operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

- (a) The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.
  
- (b) The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in FESOP, F037-5532-00040, issued December 10, 1996. All terms and conditions in FESOP, F037-5532-00040 are no longer in effect.

## **SECTION B            GENERAL CONDITIONS**

### **B.1    Permit No Defense [326 IAC 2-1-10] [IC 13]**

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

### **B.2    Definitions [326 IAC 2-8-1]**

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

### **B.3    Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4    Enforceability [326 IAC 2-8-6]**

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
  
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### **B.5    Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6    Severability [326 IAC 2-8-4(4)]**

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

### **B.7    Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8    Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

- (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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
  
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
  
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall

furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification 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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(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, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
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 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require 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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (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, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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, OAM, any additional information identified as

needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification

procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 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 Management  
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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) 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 2-8-15(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 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, 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.  
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM,, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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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 2-8-5(a)(4)]**

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All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

**C.7 Stack Height [326 IAC 1-7]**

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(a) The Permittee shall comply with the 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.

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]  
[40 CFR 61, Subpart M]**

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

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

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(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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 insure 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

- (3) 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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the 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 mandatory 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.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the 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
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

##### C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (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. This compliance monitoring plan is comprised of:

- (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, OAM upon request and shall be subject to review and approval by IDEM, OAM. 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) Response steps that will 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 such 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, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. 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 or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned 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.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

#### **C.17 Monitoring Data Availability**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

#### **C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]**

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- (a) Records of all required monitoring data 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 and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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 Management  
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, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
  - (e) All instances of deviations must be clearly identified in such reports. A reportable 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) An emergency as defined in 326 IAC 2-7-1(12); or
    - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
    - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
  - (g) 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.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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**

- (1) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU1, rated at 8.37 MMBtu/hr heat input, with no controls, and exhausting to stack 2001.
- (2) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU2, rated at 10.5 MMBtu/hr heat input, with no controls, and exhausting to stack 2002.

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.1.1 Particulate Matter (PM)[326 IAC 6-1-2]**

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- (a) Pursuant to 326 IAC 6-1-2(b)(4), particulate matter emissions from the two (2) boilers shall not exceed 0.15 pounds per million British thermal units when operating with fuel oil.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), particulate matter emissions from the two (2) boilers shall not exceed 0.01 grains per dry standard cubic foot when operating with natural gas. At an air flow rate of 3,000 cfm for each boiler, this is equivalent to 0.26 pounds per hour per boiler.

### **Compliance Determination Requirements**

#### **D.1.2 Testing Requirements [326 IAC 2-8-5(1)]**

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Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

#### **D.1.3 Natural Gas Fired Boiler Certification**

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A semi-annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 and December 31 of each year.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 4,537 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber for particulate control, and exhausting to stack 7022.
- (4) Three (3) cutting and grinding operations, identified as EU4, EU5 and EU6, consisting of 20 grinding machines and 3 cutting/grinding machines, with a maximum capacity of 1,800 lbs/hr each, using cyclone dust collectors in series with baghouses for particulate control, with flow rates of 8,000 cfm, 8,000 cfm and 1,500 cfm respectively, and exhausting to stacks 4131, 4158 and 4159.
- (5) One (1) mandreling/vulcanizing operation, identified as EU 3, consisting of 1 dusting table and 1 dusting booth, with a maximum capacity of 1,800 lbs/hr and a flow rate of 11,000 cfm, using a baghouse for particulate control, and exhausting to stack 4130.

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.2.1 Particulate Matter (PM) [326 IAC 6-1-2][326 IAC 2-8]**

- (a) Pursuant to 326 IAC 2-8, particulate matter emissions from the mandreling operation (EU3) and the three grinding operations (EU4, EU5 and EU6) shall not exceed 3.81 pounds per hour from each emission unit. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) Pursuant to 326 IAC 2-8, particulate matter emissions from the mixing operation (EU7) shall not exceed 6.24 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (c) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the above mentioned facilities shall be limited to 0.03 grain per dry standard cubic foot. At their respective flow rates, this is equivalent to the pounds per hour listed in the following table:

Facility	Flow Rate (cfm)	326 IAC 6-1-2 limit	Pounds per Hour
EU3	11,000	0.03 gr/dscf	2.83
EU4	8,000	0.03 gr/dscf	2.06
EU5	8,000	0.03 gr/dscf	2.06
EU6	1,500	0.03 gr/dscf	0.39
EU7	25,200	0.03 gr/dscf	6.48

**D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

## Compliance Determination Requirements

### D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

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Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

### D.2.4 Particulate Matter (PM)

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Pursuant to OP 10-01-93-0343, issued on April 3, 1990 and OP 19-01-93-0344, issued on April 3, 1990, the wet scrubber and baghouses for PM control shall be in operation at all times when the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 are in operation and exhausting to the outside atmosphere.

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

### D.2.5 Visible Emissions Notations

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- (a) Daily visible emission notations of the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 stack's exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.2.6 Wet Scrubber/Baghouse Inspections

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The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle
- c) Monitoring of automatic pressure indicator

Weekly:

- a) Bag cleaning mechanisms
- b) Condition of the ductwork

Monthly:

- a) Internal inspection for air leaks
- b) Bag condition
- c) Fan condition and operation

#### D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 stack's exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 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.

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

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

Source Name: Jasper Rubber Products, Inc.  
Source Address: 1010 First Avenue, Jasper, Indiana 47546  
Mailing Address: 1010 First Avenue, Jasper, Indiana 47546  
FESOP No.: F 037-9390-00040

**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 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Jasper Rubber Products, Inc.  
Source Address: 1010 First Avenue, Jasper, Indiana 47546  
Mailing Address: 1010 First Avenue, Jasper, Indiana 47546  
FESOP No.: F 037-9390-00040

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

**9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe 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

**9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
CThe Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:

Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    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/deviation:
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: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Jasper Rubber Products, Inc.  
Source Address: 1010 First Avenue, Jasper, Indiana 47546  
Mailing Address: 1010 First Avenue, Jasper, Indiana 47546  
FESOP No.: F 037-9390-00040

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From                      To


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 MANAGEMENT  
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 SEMI-ANNUAL COMPLIANCE REPORT**

Source Name: Jasper Rubber Products, Inc.  
 Source Address: 1010 First Avenue, Jasper, Indiana 47546  
 Mailing Address: 1010 First Avenue, Jasper, Indiana 47546  
 FESOP No.: F 037-9390-00040

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

**LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation	No Deviations

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit and Minor Modification

#### Source Background and Description

**Source Name:** Jasper Rubber Products, Inc.  
**Source Location:** 1010 First Avenue, Jasper, Indiana 47546  
**County:** Dubois  
**SIC Code:** 3053  
**Operation Permit No.:** F037-9390-00040  
**Permit Reviewer:** J. Patterson

#### Discussion

On March 18, 1996, the Office of Air Management received an application for a Federally Enforceable State Operating Permit (FESOP) from Jasper Rubber Products to operate a rubber and plastic seal, gasket and custom form manufacturing source. This application was reviewed and a FESOP, F037-5532-00040, was issued on December 10, 1996. On January 20, 1998, the Office of Air Management received a request from Jasper Rubber Products, Inc. for a minor modification to their FESOP. This minor modification, which triggered the requirements of 326 IAC 2-1-2 to obtain a registration, consisted of the addition of a mixing machine to the mixing operation, EU7. Upon review of this minor modification request and due to extensive changes made to the FESOP model language, the OAM has decided to incorporate this modification into a new FESOP and accompanying Technical Support Document. This new FESOP, F037-9390-00040, will reflect all changes that the OAM has made to the FESOP model permit and also better describe the facilities being permitted and the respective standards and conditions. This new FESOP, F037-9390-00040, will supercede the FESOP, F037-5532-00040, issued on December 10, 1996. At the same time, a registration R037-9390-00040, is being processed for addition of the mixing machine to EU7 to satisfy the requirements under 326 IAC 2-1-3.

#### Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU1, rated at 8.37 MMBtu/hr heat input, with no controls, and exhausting to stack 2001.
- (2) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU2, rated at 10.5 MMBtu/hr heat input, with no controls, and exhausting to stack 2002.
- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 4537 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/baghouse system for particulate control, and exhausting to stack 7022.
- (4) Three (3) cutting and grinding operations, identified as EU4, EU5 and EU6, consisting of 20 grinding machines and 3 cutting/grinding machines, with a maximum capacity of

1,800 lbs/hr each, using cyclone dust collectors in series with baghouses for particulate control, with flow rates of 8,000 cfm, 8,000 cfm and 1,500 cfm respectively, and exhausting to stacks 4131, 4158 and 4159.

- (5) One (1) mandreling/vulcanizing operation, identified as EU 3, consisting of 1 dusting table and 1 dusting booth, with a maximum capacity of 1,800 lbs/hr and a flow rate of 11,000 cfm, using a baghouse for particulate control, and exhausting to stack 4130.

### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

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

### **New Emission Units and Pollution Control Equipment Requiring ENSR**

The application includes information relating to the construction and operation of the following equipment:

- (1) One mixing machine, to be added to EU7 Mixing and Weighing operations, with a maximum capacity of 787 pounds per hour, with a flow rate of 25,200 cfm, using a wet scrubber/baghouse system for particulate control, and exhausting to stack 7022.

### **Insignificant Activities**

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight
- (3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month
- (4) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons
- (5) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids
- (6) Filing drums, pails, or other packaging containers with lubricating oils, waxes, and greases
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings
- (8) Machining where an aqueous cutting coolant continuously floods the machining surface
- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- (10) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius; the use of which for all cleaners combined

does not exceed 145 gallons per 12 months

- 11) Closed loop heating and cooling systems
- 12) Natural draft cooling towers not regulated under a NESHAP
- 13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
- 14) Heat exchanger cleaning and repair
- 15) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone
- 16) 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.
- 17) Mold release agents using low volatile products
- 18) A laboratory as defined in 326 IAC 2-7-1(20)(C)
- 19) Activities emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs, including stripping for product identification and bonding agents.
- 20) Activities emitting less than or equal to 3.0 pounds per hour of 15 pounds per day of volatile organic compounds (VOC) or 5.0 pounds per hour of 25 pounds per day of particulate matter including a spray booth, post cure and curing ovens and injection molding operations.

### Existing Approvals

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

- (1) OP 10-01-93-0343, issued on April 3, 1990;
- (2) OP 19-01-93-0344, issued on April 3, 1990;
- (3) F 037-5532-00040, issued on December 10, 1996; and
- (4) R 037-9390-00040, proposed at the same time as this minor modification to satisfy the requirements of 326 IAC 2-1-3.

All conditions from previous approvals were incorporated into this FESOP.

### Enforcement Issue

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the FESOP 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 incomplete FESOP application for the purposes of this review was received on March 18, 1996. Additional information received on October 1, 1996 makes the FESOP application administratively complete.

In addition, a request for a minor modification was received on January 20, 1998 and is included in this review.

**Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

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

HAP's	Potential Emissions (tons/year)
Insignificant	negligible
TOTAL	negligible

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of particulate matter are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) A source with “potential to emit” high enough to make it a “major source” but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP). The source has accepted a federally enforceable PM10 limit of 99 tons per year.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	.054
PM-10	.004
SO <sub>2</sub>	.011
VOC	.095
CO	0
NO <sub>x</sub>	2.12
HAP (specify)	0

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boiler EU1, EU2	1.2	1.2	41.9	0.323	2.95	11.8	neg.
Mandreling and Vulcanizing, EU3	16.7	16.7	neg.	neg	neg	neg.	neg.
Grinding EU4	16.7	16.7	neg	neg	neg	neg.	neg
EU5	16.7	16.7					
EU6	16.7	16.7					
Mixing, EU7	27.4	27.4	neg	neg	neg	neg	neg.
Insignificant Activities	3.6	3.6	neg	neg	neg	neg	neg.
<b>Total Emissions</b>	<b>99</b>	<b>99</b>	<b>41.9</b>	<b>0.323</b>	<b>2.95</b>	<b>11.8</b>	<b>neg.</b>

**County Attainment Status**

The source is located in Dubois County.

Pollutant	Status
TSP	non-attainment
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 (Nox) 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. Dubois County has been designated as attainment or unclassifiable for ozone.

- (b) Jasper Rubber Products is located in Dubois County, Bainbridge Township, and this portion of the county has been designated as secondary non-attainment for TSP.

### **Federal Rule Applicability**

- (a) The 10.5 MMBtu/hr natural gas-fired/oil-fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because construction commenced prior to June 9, 1989.
- (b) There are no National Emission Standards for Hazardous Air Pollutants, (NESHAP, 40 CFR Part 63), applicable to this source.

This federal rule evaluation was done during the original review for the source's FESOP and this minor modification does not affect the results of this evaluation.

### **State Rule Applicability - Entire Source**

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on March 18, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### 326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4, PM10 emissions shall be limited to 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### 326 IAC 2-2 Prevention of Significant Deterioration

This source is not a major stationary source because the potential to emit criteria pollutants are less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### 326 IAC 2-3 Emission Offset

This source is not a major stationary source because the potential to emit particulate matter is limited to less than 100 tons per year in order to comply with 326 IAC 2-8. Therefore, pursuant to 326 IAC 2-3, the emission offset requirements do not apply.

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

This source is located in Dubois County and the potential to emit criteria pollutants is less than one-hundred tons per year including fugitive emissions and it is not one of the twenty-eight (28) listed sources, therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

This evaluation for applicability of state rule to the entire source was done during the original review for the source's FESOP and this minor modification does not affect the results of this evaluation.

## State Rule Applicability - Individual Facilities

### 326 IAC 6-1-2 (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2, sources located in the counties listed in the rule with the potential to emit 100 tons or more of particulate matter per year or have actual PM emissions of 10 tons or more shall comply with the emission limitations of this rule. The following emission limitations shall apply:

- (a) Pursuant to 326 IAC 6-1-2(b)(4), particulate matter emissions from the boilers, EU1 and EU2, shall not exceed 0.15 pounds per MMBtu when operating with fuel oil.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), particulate matter emissions from the boilers, EU1 and EU2, shall not exceed 0.01 grains per dry standard cubic feet when operating with natural gas.
- (c) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7, shall not exceed 0.03 grains per dry standard cubic feet.

The potential emissions from the boilers are less than the allowables. Therefore, the boiler is capable of complying with this rule when combusting natural gas or fuel oil.

The baghouses shall be in operation at all times the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 are in operation, in order to comply with this limit.

This evaluation for applicability of state rule to individual facilities was done during the original review for the source's FESOP and this minor modification does not affect the results of this evaluation.

## 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 have applicable compliance monitoring

conditions as specified below:

- (a) Daily visible emissions notations of the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:
- Daily:
- 1) Adequate dust removal from hoppers
  - 2) Monitoring of bag cleaning cycle
- Weekly:
- 1) Bag cleaning mechanisms
  - 2) Condition of the ductwork
- Monthly:
- 1) Internal inspection for air leaks
  - 2) Bag condition
  - 3) Fan condition and operation

These monitoring conditions are necessary because the baghouses must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Emission Limitations) and 326 IAC 2-8 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

## **Conclusion**

The operation of this rubber and plastic seal, gasket and custom form manufacturing source shall be subject to the conditions of the attached proposed FESOP No. F037-9390-00040.

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)  
and Minor Modification

**Jasper Rubber Products, Inc.  
1010 First Avenue, Jasper, IN 47546**

**F-037-9390, Plt ID-037-00040**

On March 21, 1998, the Office of Air Management (OAM) had a notice published in the Herald, Jasper, Indiana, stating that Jasper Rubber Products, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary rubber and plastic seal, gasket and custom form manufacturing source with controls. The notice also stated that OAM 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.

On April 16, Jasper Rubber Products, Inc. submitted comments on the proposed FESOP. The comments, as submitted by the source, and OAM's responses are as follows. Changes are bolded for emphasis.

**Comment 1:**

**A.1 Page 5 of 35**

Please change the Responsible Official to Mr. Max McCune, Executive Vice President of Operations for Jasper Rubber.

**Response to Comment 1:**

The Responsible Official has been revised to read Mr. Max McCune.

**Comment 2:**

**A.2 Page 5 of 35**

Items (3), (4) and (5) each include a partial listing of pieces of equipment used in the referenced operations as a "consisting of ..." phrase. The FESOP application was developed to indicate the maximum rate at which an operation may be required to run. The equipment is such that a maximum operating rate must be estimated. These operations may or may not be able to operate at the indicated maximum rates under the current configuration.

For operating permit purposes, identifying a maximum operating rate and corresponding emission rate for each operation should be sufficient without identifying individual pieces of equipment. Therefore, if we are required to add a piece of equipment to attain the permitted levels, we should be able to do so without modifying the permit.

Conversely, if an equipment list is included, it is our understanding that a modification may be required if we add equipment in order to reach the permit levels. It is our opinion that this type of modification would be unnecessary as it would not alter the indicated potential emissions, limited emissions or the permit structure and status. Therefore, please omit the partial equipment listings in the descriptions to avoid the

possibility of unnecessary and frivolous future modifications.

**Response to Comment 2:**

The equipment mentioned in items (3), (4) and (5) was in the application submitted by the source and is listed in the description in order to define emission units as accurately as possible. This is especially relevant to assist inspectors to assure compliance with the permit. The source is not allowed to add new equipment above exemption levels even if potential to emit levels will not increase, especially if the new equipment will emit the pollutant for which the source has accepted a limit. New equipment must be reviewed under New Source Review rules. In most cases, irrespective of New Source Review, addition of equipment will warrant an administrative amendment or minor modification to the FESOP. Therefore, the description of these emission units will remain unchanged.

**Comment 3:**

**A.3(19) Page 6 of 35**

Item 19, "bet" should read "but". Item 20, "of" should read "or".

**Response to Comment 3:**

The OAM agrees and the following changes will be made to the final FESOP:

Insignificant Activities, page 6 of 35, will be changed as follows:

- 19) Activities emitting greater than 1 pound per day ~~bet~~ **but** less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs, including striping for product identification and bonding agents.
- 20) Activities emitting less than or equal to 3.0 pounds per hour ~~of~~ **or** 15 pounds per day of volatile organic compounds (VOC) or 5.0 pounds per hour of 25 pounds per day of particulate matter including a spray booth, post cure and curing ovens and injection molding operations.

The following changes in the Technical Support Document (TSD) should be noted:

Insignificant Activities, page 3 of 9, should be as follows:

- 19) Activities emitting greater than 1 pound per day ~~bet~~ **but** less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs, including striping for product identification and bonding agents.
- 20) Activities emitting less than or equal to 3.0 pounds per hour ~~of~~ **or** 15 pounds per day of volatile organic compounds (VOC) or 5.0 pounds per hour of 25 pounds per day of particulate matter including a spray booth, post cure and curing ovens and injection molding operations.

**Comment 4:**

**C.19(a) Page 24 of 35**

This condition requires Jasper Rubber to prepare and submit a Quarterly Compliance Report. The previous FESOP, F037-5532-00040 did not require any compliance reporting in addition to the Annual

Compliance Certification. Does the additional 0.2 tons per year potential particulate emissions added by this modification elevate this source to status which requires quarterly compliance monitoring?

Also, no surrogate process parameters must be monitored for Jasper Rubber to demonstrate compliance. Essentially, the Quarterly Compliance Report is simply a summary statement of deviations. Per permit condition B.15(a), the source is required to report any deviations within ten days from the date of discovery. Since the report would simply duplicate information previously submitted to the IDEM, we seriously question the need for a Quarterly Compliance Report.

#### **Response to Comment 4:**

Pursuant to 326 IAC 2-7-5(3)(C)(i), with respect to monitoring, a Part 70 permit shall incorporate all applicable reporting requirements or alternative requirements established in section 24 or 25 of 326 IAC 2-7-5 and require the submittal of reports of any required monitoring at least every six (6) months.

IDEM, OAM has revised this condition to specify that this report is only required for compliance monitoring requirements and for sources that are not required to submit any quarterly reports, this report shall be submitted semi-annually.

The following changes will be made to the final FESOP:

1. Because of a revision by OAM, Condition C.19(a), page 24 of 35, has changed from:
  - (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

to be as follows:

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-annual Compliance Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
2. Because of a revision by OAM, the Compliance Report form, page 35 of 35, has changed from:

#### **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY COMPLIANCE REPORT**

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

to be as follows:

#### **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) ~~QUARTERLY~~ SEMI-ANNUAL COMPLIANCE REPORT**

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted ~~quarterly~~ **semi-annually**. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

**Comment 5:**

**D.1.3 Page 27 of 35**

An annual natural gas fired boiler certification is requested by this condition. The previous permit did not require a boiler certification, and the modification does not involve the boilers. We question the need for this certification.

First of all, Jasper Rubber indicated that only natural gas or No. 2 fuel oil will be used to fire these boilers. The calculations performed during the original FESOP review, (see enclosed pages 1-4 of TSD, Appendix A), indicate that the boilers are in compliance with the particulate emission limitations in Section D.1.1(a) and (b) of the draft permit.

Secondly, the Annual Compliance Certification mandated per condition B.12, must address the compliance status of the entire source with respect to the permit conditions. Therefore, the Annual Compliance Certification will verify the compliance status of the boilers. It appears as though an annual boiler certification will be duplicative.

**Response to Comment 5:**

The OAM requires compliance monitoring for all boilers that are significant emission units (greater than or equal to 10 million Btu/hr heat input). In the case of Jasper Rubber Products' boilers, this compliance monitoring would entail daily visible emission notations. However, in lieu of these compliance monitoring requirements, the source may verify compliance by the submittal of the natural gas boiler certification. Because this is a certification of compliance, this report should be submitted semi-annually as opposed to annually, as stated in the proposed FESOP.

The following changes will be made to the final FESOP:

1. Because of a reporting frequency change, Condition D.1.3, page 27 of 35, has changed from:

**D.1.3 Natural Gas Fired Boiler Certification**

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

to be as follows:

**D.1.3 Natural Gas Fired Boiler Certification**

~~An~~ **A semi-annual** certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 **and December 31** of each year.

**Comment 6:**

**D.2 Page 28 of 35**

The description section indicates that the mixing operation maximum capacity is 3,750 lbs/hr. This should be changed to 4,537 lbs/hr.

**Response to Comment 6:**

The OAM agrees and the following changes will be made to the final FESOP:

Section D.2, item (3), page 28 of 35, has changed from:

- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 3,750 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/baghouse system for particulate control, and exhausting to stack 7022.

to be as follows:

- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of ~~3,750~~ **4,537** lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/baghouse system for particulate control, and exhausting to stack 7022.

**Comment 7:**

**D.2.1(c) Page 28 of 35**

This condition indicates which facilities must comply with 326 IAC 6-1-2(a), limiting particulate emissions to 0.03 grains per dry standard cubic foot. The condition includes a table which illustrates the equivalent pound per hour emission rates at given flow rates. 326 IAC 6-1-2(a) limits emissions on a concentration basis, not a mass rate. Therefore, to avoid confusion, we request the IDEM remove the column indicating the mass rate of emissions in pounds per hour. We are concerned that the mass rate column may be misconstrued as an emission limitation.

**Response to Comment 7:**

The equivalent pounds per hour rate is not an emission limitation. It is written as an equivalent, based on the flow rate in the table, to the grains/dscf emission limit. This equivalent is helpful to the inspectors as most facilities in the state that are regulated for particulate are applicable to 326 IAC 6-3-2, which gives the emission limit in pounds per hour. Therefore, this condition will remain unchanged.

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

1. Item (3) of Section A.2, Emission Units and Pollution Control Equipment Summary, on page 5 of 35 and Item (3) of Section D.2 on page 28 of 35 of the proposed permit, have changed from:
  - (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of **4,537** lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/baghouse system for particulate control, and exhausting to stack 7022.

to be as follows, on page 5 of 35 of the final permit:

- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 4,537 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/~~baghouse system~~ for particulate control, and exhausting to stack 7022.

The following changes in the Technical Support Document (TSD) should be noted:

Item (3) of the Permitted Units and Control Equipment, page 1 of 9, should be as follows:

- (3) One (1) mixing operation, identified as EU7, consisting of 2 scales, carbon black dispenser and 7 mixing machines, with a maximum capacity of 4,537 lbs/hr and a flow rate of 25,200 cfm, using a wet scrubber/~~baghouse system~~ for particulate control, and exhausting to stack 7022.

2. Because of the change of the control equipment description of Item (3) of the Permitted Emission Units and Control Equipment, the Compliance Determination Requirements, Section D.2.4 Particulate Matter (PM), on page 29 of 35, has changed from:

Pursuant to OP 10-01-93-0343, issued on April 3, 1990 and OP 19-01-93-0344, issued on April 3, 1990, the baghouses for PM control shall be in operation at all times when the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 are in operation and exhausting to the outside atmosphere.

to be as follows, on page 29 of 35 of the final permit:

Pursuant to OP 10-01-93-0343, issued on April 3, 1990 and OP 19-01-93-0344, issued on April 3, 1990, the **wet scrubber and** baghouses for PM control shall be in operation at all times when the mandreling and vulcanizing operation EU3, the three grinding operations EU4, EU5 and EU6 and the mixing operations EU7 are in operation and exhausting to the outside atmosphere.

3. Because of the change of the control equipment description of Item (3) of the Permitted Emission Units and Control Equipment, Compliance Monitoring Requirements, Section D.2.6 Baghouse Inspections on page 29 of 35, has changed from:

#### D.2.6 Baghouse Inspections

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The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle

to be as follows, on page 29 of 35 of the final permit:

#### D.2.6 **Wet Scrubber/Baghouse** Inspections

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The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle

**c) Monitoring of automatic pressure indicator**

The following changes in the Technical Support Document (TSD) should be noted:

Compliance Requirements, page 8 of 9, item 1(b), should be as follows:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle
- c) Monitoring of automatic pressure indicator**

**Appendix A: Emission Calculations  
Particulate Matter Emission**

**Company Name: Jasper Rubber Products, Inc.**  
**Address City IN Zip: 1010 First Avenue, Jasper, IN 47546**  
**CP: 037-9390**  
**Plt ID: 037-00040**  
**Reviewer: J. Patterson**  
**Date: 3/2/98**

**State Allowables 326 IAC 6-1-2(a)**

Facility	Flow Rate	Limit (gr/scf)	lbs/hr PM	lbs/day PM	tons/yr PM
Mixing Machine	25200	0.03	6.48	155.52	28.3824

Methodology

Flow rate x Limit x 60 min/hr x 1lb/7000 gr = lbs/hr  
 lbs/hr x 24 hr/day = lbs/day  
 lbs/day x 365 days/yr x 1 ton/2000 lbs = tons/yr

**Potential to Emit**

Facility	Max Capacity (lbs/hr)	Emis. Factor (lb/lb mixed)	lbs/hr PM	lbs/day PM	tons/yr PM
Mixing Machine	787	0.00319	2.51053	60.25272	10.9961214

Methodology

Max Capacity x Emission Factor = lbs/hr  
 lbs/hr x 24 hours/day = lbs/day  
 lbs/day x 365 days/yr x 1 ton/2000 lbs = tons/yr