



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Press-Seal Corporation in Allen County

Significant Permit Revision No.: 003-43107-00360

The Indiana Department of Environmental Management (IDEM) has received an application from Press-Seal Corporation, located at 2424 West State Boulevard, Fort Wayne, Indiana 46808, for a significant revision of its FESOP issued on December 3, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Press-Seal Corporation to make certain changes at its existing source. Press-Seal Corporation has applied to add new emission units to the permit, to modify existing emission units, and to remove emission units from the permit.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Allen County Public Library  
900 Library Plaza  
Fort Wayne, In 46802

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

### How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will

make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 003-43107-00360 in all correspondence.

**Comments should be sent to:**

Olajumoke Kayode  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Olajumoke Kayode or (317) 234-5373  
Or dial directly: (317) 234-5373  
Fax: (317) 232-6749 attn: Olajumoke Kayode  
E-mail: okayode@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**What will happen after IDEM makes a decision?**

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

If you have any questions, please contact Olajumoke Kayode of my staff at the above address.



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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**Eric J. Holcomb**  
Governor

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**Bruno L. Pigott**  
Commissioner

Mr. Brad Carpenter  
Press-Seal Corporation  
2424 West State Boulevard  
Fort Wayne, In 46808

Re: 003-43107-00360  
Significant Revision to  
F003-32125-00360

Dear Mr. Carpenter:

Press-Seal Corporation was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F003-32125-00360 on December 3, 2012 for a stationary rubber seal and gasket manufacturing operation located at 2424 West State Boulevard, Fort Wayne, Indiana 46808. On August 3, 2020, the Office of Air Quality (OAQ) received an application from the source requesting to add new emission units to the permit, to modify existing emission units, and to remove emission units from the permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission unit is /units are approved for construction at the source:

- (a) Rubber extrusion Line 0, permitted in 2020, with a maximum throughput of 900 lbs/hr, using no control, and exhausting to stacks 25 and 26.
- (b) One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, permitted in 2020, with a maximum throughput of 750 lbs/hr, using no control, and exhausting to stacks 21 and 22.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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If you have any questions regarding this matter, please contact Olajumoke Kayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for Olajumoke Kayode or (317) 234-5373.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Allen County  
Allen County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch



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Governor

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Commissioner

**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

**Press-Seal Corporation  
2424 West State Blvd.  
Fort Wayne, Indiana 46808**

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

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

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

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

|   |  |
|---|--|
| Operation Permit No.: F003-32125-00360  |  |
| Master Agency Interest ID: 6332   |  |
| Issued by: Original Signed by:<br>Iryn Calilung, Section Chief<br>Permits Branch, Office of Air Quality   | Issuance Date: December 3, 2012<br><br>Expiration Date: December 3, 2022 |
| Minor Permit Revision No. 003-33230-00360, issued on July 16, 2013.<br>Administrative Amendment No: 003-36978-00360, issued on May 5, 2016.<br>Significant Permit Revision No. 003-40755-00360, issued on April 2, 2019.<br>Administrative Amendment No. 003-42278-00360, issued on February 21, 2020 |  |
| Significant Permit Revision No.: 003-43107-00360  |  |
| Issued by:<br><br>Iryn Calilung,<br>Section Chief, Permits Branch<br>Office of Air Quality  | Issuance Date:<br><br>Expiration Date: December 3, 2022                  |

# DRAFT

## TABLE OF CONTENTS

|                  |  |           |
|------------------|--|-----------|
| <b>SECTION A</b> | <b>SOURCE SUMMARY .....</b>  | <b>4</b>  |
| A.1              | General Information [326 IAC 2-8-3(b)]   |           |
| A.2              | Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]   |           |
| A.3              | Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]   |           |
| A.4              | FESOP Applicability [326 IAC 2-8-2]  |           |
| <b>SECTION B</b> | <b>GENERAL CONDITIONS .....</b>  | <b>8</b>  |
| B.1              | Definitions [326 IAC 2-8-1]  |           |
| B.2              | Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]   |           |
| B.3              | Term of Conditions [326 IAC 2-1.1-9.5]   |           |
| B.4              | Enforceability [326 IAC 2-8-6][IC 13-17-12]  |           |
| B.5              | Severability [326 IAC 2-8-4(4)]  |           |
| B.6              | Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]   |           |
| B.7              | Duty to Provide Information [326 IAC 2-8-4(5)(E)]  |           |
| B.8              | Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]   |           |
| B.9              | Annual Compliance Certification [326 IAC 2-8-5(a)(1)]  |           |
| B.10             | Compliance Order Issuance [326 IAC 2-8-5(b)]   |           |
| B.11             | Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]  |           |
| B.12             | Emergency Provisions [326 IAC 2-8-12]  |           |
| B.13             | Prior Permits Superseded [326 IAC 2-1.1-9.5]   |           |
| B.14             | Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]  |           |
| B.15             | Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]     |           |
| B.16             | Permit Renewal [326 IAC 2-8-3(h)]  |           |
| B.17             | Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]  |           |
| B.18             | Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]   |           |
| B.19             | Source Modification Requirement [326 IAC 2-8-11.1]   |           |
| B.20             | Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]   |           |
| B.21             | Transfer of Ownership or Operational Control [326 IAC 2-8-10]  |           |
| B.22             | Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]   |           |
| B.23             | Advanced Source Modification Approval [326 IAC 2-8-4(11)][326 IAC 2-1.1-9]   |           |
| B.24             | Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]   |           |
| <b>SECTION C</b> | <b>SOURCE OPERATION CONDITIONS.....</b>  | <b>18</b> |
|                  | <b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>   | <b>18</b> |
| C.1              | Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] |           |
| C.2              | Overall Source Limit [326 IAC 2-8]   |           |
| C.3              | Opacity [326 IAC 5-1]  |           |
| C.4              | Open Burning [326 IAC 4-1][IC 13-17-9]   |           |
| C.5              | Incineration [326 IAC 4-2][326 IAC 9-1-2]  |           |
| C.6              | Fugitive Dust Emissions [326 IAC 6-4]  |           |
| C.7              | Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]  |           |
|                  | <b>Testing Requirements [326 IAC 2-8-4(3)].....</b>  | <b>20</b> |
| C.8              | Performance Testing [326 IAC 3-6]  |           |
|                  | <b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>  | <b>21</b> |
| C.9              | Compliance Requirements [326 IAC 2-1.1-11]   |           |
|                  | <b>Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)].....</b>  | <b>21</b> |
| C.10             | Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]  |           |
| C.11             | Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]   |           |

## DRAFT

|   |           |
|---|-----------|
| <b>Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b> .....           | <b>22</b> |
| C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]  |           |
| C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]                         |           |
| C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5] |           |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....                         | <b>23</b> |
| C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]                        |           |
| C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]                       |           |
| <b>Stratospheric Ozone Protection</b> .....   | <b>24</b> |
| C.17 Compliance with 40 CFR 82 and 326 IAC 22-1   |           |
| <b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b> .....                                      | <b>25</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....                                | <b>26</b> |
| D.1.1 Particulate [326 IAC 6-3-2]   |           |
| D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  |           |
| <b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b> .....                             | <b>27</b> |
| D.1.3 Particulate Control   |           |
| <b>Compliance Monitoring Requirements [326 IAC 2-8-4(3)]</b> .....                                | <b>27</b> |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....                         | <b>27</b> |
| D.1.6 Record Keeping Requirement  |           |
| D.1.7 Reporting Requirements  |           |
| <b>SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS</b> .....                                      | <b>29</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....                                | <b>29</b> |
| D.2.1 FESOP [326 IAC 2-8-4][326 IAC 2-4.1]  |           |
| D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]  |           |
| <b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b> .....                             | <b>29</b> |
| D.2.3 HAP [326 IAC 2-1.1-11]  |           |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....                         | <b>29</b> |
| D.2.4 Record Keeping Requirements   |           |
| D.2.5 Reporting Requirements  |           |
| <b>SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS</b> .....                                      | <b>31</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....                                | <b>31</b> |
| D.3.1 Particulate Emissions [326 IAC 6-2-4]   |           |
| <b>CERTIFICATION</b> .....  | <b>32</b> |
| <b>EMERGENCY OCCURRENCE REPORT</b> .....  | <b>33</b> |
| <b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT</b> .....                                 | <b>37</b> |

## DRAFT

### SECTION A SOURCE SUMMARY

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

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

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

|                              |  |
|------------------------------|--|
| Source Address:              | 2424 West State Blvd., Fort Wayne, Indiana 46808   |
| General Source Phone Number: | 574-457-0030   |
| SIC Code:                    | 3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)   |
| County Location:             | Allen  |
| Source Location Status:      | Attainment for all criteria pollutants   |
| Source Status:               | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

- (a) One (1) rubber molding operation, identified as EU-1, consisting of seven (7) hydraulic injection molding units with five (5) cooling tables, constructed in 2004, approved in 2016 for modification to add two (2) more hydraulic injection molding units to the existing five (5) units, with a maximum throughput of 1050 pounds of rubber per hour, exhausting to stack 12.
- (b) One (1) extrusion process, identified as EU-2, constructed in 2004 and approved in 2020 to process rubber materials only, using no control, and consisting of the following:

| Unit ID | Extrusion type                          | Maximum Throughput (lbs/hr) | Exhaust stack            |
|---------|---|-----------------------------|--------------------------|
| Line 0* | Rubber Extrusion with NO2/NO3 Salt Bath | 900                         | Stacks 25 and 26         |
| Line 1  | Rubber Extrusion with NO2/NO3 Salt Bath | 900                         | Stacks 16, 17, 18 and 20 |
| Line 3  | Rubber Extrusion with Microwave         | 900                         |                          |
| Line 4  | Rubber Extrusion with Microwave         | 900                         |                          |

\*approved in 2020 for construction  
 Lines 0 and 1 will go through a NO2/NO3 salt bath cure only  
 Lines 3 and 4 only go through the Hot Air Curing (GO-1) process (see A.2(i) below).

- (c) One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, approved in 2020 for construction, with a maximum throughput of 750 lbs/hr, using no control, and exhausting to stacks 21 and 22.

## DRAFT

- (d) One (1) compression molding operation, identified as EU-4, consisting of three (3) compression molders and one (1) cooling table, constructed in 2004, with a maximum throughput of 105 pounds of rubber per hour, and exhausting to stack 23.
- (e) One (1) adhesive mixing table, identified as EU-5, constructed in 2004 and relocated to the painting booth (EU-6) in 2008, with a maximum throughput of 3.0 pounds of adhesive per hour, and exhausting to stack 24.
- (f) One (1) painting booth, identified as EU-6, utilizing cans of spray paint to apply coating to metal core bits, constructed in 2008, with a maximum throughput of 2.0 pounds of coating per hour (2 cans/hour, each can weighing 1 pound), using cartridge filters for particulate control, exhausting to stack 24.
- (g) One (1) rubber splicing/vulcanizing operation, identified as EU-7, with a total maximum capacity of 970 pounds of rubber per hour, no control, consisting of the following:
  - (1) Three (3) hydraulic platen press curing lines, constructed in 1997, 2000, and 2006, with a combined maximum capacity of 660 pounds of rubber per hour, and exhausting to the indoors.
  - (2) Twenty-four (24) pneumatic platen press curing tables, with a combined maximum capacity of 58 pounds of rubber per hour, uncontrolled, exhausting to the indoors, and consisting of the following:
    - (A) Ten (10) pneumatic platen press curing tables, constructed in 2004;
    - (B) Four (4) pneumatic platen press curing tables, constructed in 2012; and
    - (C) Ten (10) pneumatic platen press curing tables, approved in 2019 for construction.
  - (3) Five (5) manual platen press curing tables, constructed in 2000, with a combined maximum capacity of 276 pounds of rubber per hour, and exhausting to the indoors.
  - (4) Used of a cutting lubricant containing VOC on the pneumatic platen press curing tables, approved in 2019, with a maximum capacity of 0.145 gallons per hour.
- (h) One (1) ink printing operation, identified as EU-8, consisting of eighteen (18) inkjet printers, printing ink serial barcodes on rubber gaskets and seals, with a combined maximum capacity of 0.0961 gallons of ink per hour, uncontrolled, exhausting to the indoors, and consisting of the following:
  - (1) Sixteen (16) inkjet printers, constructed in 2002 and 2009; and
  - (2) Two (2) inkjet printers, approved in 2019 for construction.
- (i) One (1) natural-gas fired grieve oven, identified as GO-1, constructed in 2004, approved in 2020 to reduce the maximum capacity, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and 1800 pounds of rubber per hour, exhausting to stack G-01.

Extruded rubber materials from Lines 3 and 4 are cured in GO-1.

## DRAFT

- (j) One (1) rubber manufacturing process, identified as EU-9, approved for construction in 2013, with a maximum capacity of 2,057 pounds of rubber per hour, using a baghouse as control, and exhausting to the indoors.

The rubber extrusion process (EU-2), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), hot air curing oven (GO-1), and rubber manufacturing process (EU-9) are considered as one facility.

The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of Rubber Extrusion Lines 0 and 1 from EU-2, which totals to 1800 lbs/hr.

- (k) One (1) vacuum conveyance system, identified as V-1, constructed in 2019, approved in 2020 to change from PVC to TPV, with a maximum throughput of 750 pounds per hour of TPV, using a dust collector system as control, and exhausting indoors. V-1 delivers TPV to Line 2.

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

This stationary source also includes the following insignificant activities:

- (a) Fifteen (15) natural gas-fired space heaters, as described in the following table:

| ID    | Heat Input Capacity (MMBtu/hr) | Year of Construction | Exhausting Stack Number |
|-------|--------------------------------|----------------------|-------------------------|
| SH-1  | 0.175                          | 2004                 | SH1                     |
| SH-2  | 0.175                          | 2004                 | SH2                     |
| SH-3  | 0.175                          | 2004                 | SH3                     |
| SH-4  | 0.175                          | 2004                 | SH4                     |
| SH-5  | 0.175                          | 2004                 | SH5                     |
| SH-6  | 0.175                          | 2004                 | SH6                     |
| SH-7  | 0.175                          | 2015                 | SH7                     |
| SH-8  | 0.175                          | 2015                 | SH8                     |
| SH-9  | 0.175                          | 2015                 | SH9                     |
| SH-10 | 0.175                          | 2015                 | SH10                    |
| SH-11 | 0.10                           | 2015                 | SH11                    |
| SH-12 | 0.10                           | 2015                 | SH12                    |
| SH-13 | 0.10                           | 2015                 | SH13                    |
| SH-14 | 0.105                          | 2015                 | SH14                    |
| SH-15 | 0.105                          | 2015                 | SH15                    |

- (b) One (1) natural gas-fired air make-up unit, identified as King Air Make-up, constructed in 2004, with a maximum heat input of 0.6 MMBtu per hour, exhausting to stack K-01.
- (c) Two (2) natural gas-fired ice heaters, identified as IH-1 and IH-2, constructed in 2004, with a total maximum heat input of 0.1 MMBtu per hour, exhausting to stacks IH-1 and IH-2.
- (d) Three (3) natural-gas fired boilers, identified as B-1 through B-3, constructed in 2004, with a total maximum heat input of 0.289 MMBtu per hour, exhausting to stacks B-1 through B-3.
- (e) One (1) natural gas-fired boiler, identified as B-4, constructed in 2015, with a total maximum heat input capacity of 7.0 MMBtu per hour, no control, exhausting to stack B-4.

## DRAFT

- (f) Four (4) plastic injection molding units as described as follows:

| Unit ID | Year of Construction | Control Unit | Exhaust Stack | Maximum Capacity (lbs/hr) |
|---------|----------------------|--------------|---------------|---------------------------|
| PI-01   | 2008                 | None         | PI-01         | 50                        |
| PI-02   | 2008                 | None         | PI-02         | 50                        |
| PI-03   | 2008                 | None         | PI-03         | 50                        |
| PI-04   | 2016                 | None         | PI-04         | 50                        |

These units use high density polyethylene (HDPE), nylon, or polypropylene resin. Each machine can only use one resin at a time.

- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Filling drums, pails or other packaging containers with lubricating oils.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, or welding equipment.
- (k) Water based activities, including the following: any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAP, water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAP, noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.
- (l) Closed loop heating and cooling systems.
- (m) Repair activities, including heat exchanger cleaning and repair.
- (n) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

## DRAFT

### SECTION B GENERAL CONDITIONS

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

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

#### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F003-32125-00360, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

#### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

#### B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

#### B.5 Severability [326 IAC 2-8-4(4)]

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

#### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

#### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

## DRAFT

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

### B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## DRAFT

### B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

### B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

## DRAFT

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

## DRAFT

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

## DRAFT

### B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to F003-32125-00360 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

### B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

### B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

### B.16 Permit Renewal [326 IAC 2-8-3(h)]

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

## DRAFT

in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

### B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

### B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

## DRAFT

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).
- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
  - (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
  - (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

### B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

## DRAFT

### B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

### B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.

## DRAFT

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)][326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## DRAFT

### SECTION C

### SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

## DRAFT

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### C.4 Open Burning [326 IAC 4-1][IC 13-17-9]

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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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).

### C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

## DRAFT

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

## DRAFT

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

(a) For new units:

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

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

## DRAFT

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

#### C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);  
or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

#### C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

## DRAFT

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

## DRAFT

- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

**C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 applicable standards for recycling and emissions reduction.

## DRAFT

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

- (a) One (1) rubber molding operation, identified as EU-1, consisting of seven (7) hydraulic injection molding units with five (5) cooling tables, constructed in 2004, approved in 2016 for modification to add two (2) more hydraulic injection molding units to the existing five (5) units, with a maximum throughput of 750 pounds of rubber per hour, exhausting to stack 12.
- (b) One (1) extrusion process, identified as EU-2, constructed in 2004 and approved in 2020 to process rubber materials only, and consisting of the following:

| Unit ID | Extrusion type                          | Maximum Throughput (lbs/hr) | Exhaust stack            |
|---------|---|-----------------------------|--------------------------|
| Line 0* | Rubber Extrusion with NO2/NO3 Salt Bath | 900                         | Stacks 25 and 26         |
| Line 1  | Rubber Extrusion with NO2/NO3 Salt Bath | 900                         | Stacks 16, 17, 18 and 20 |
| Line 3  | Rubber Extrusion with Microwave         | 900                         |                          |
| Line 4  | Rubber Extrusion with Microwave         | 900                         |                          |

\*approved in 2020 for construction  
 Lines 0 and 1 will go through a NO2/NO3 salt bath cure only  
 Lines 3 and 4 only go through the Hot Air Curing (GO-1) process.

- (c) One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, approved in 2020 for construction, with a maximum throughput of 750 lbs/hr, and exhausting to stacks 21 and 22.
- (d) One (1) compression molding operation, identified as EU-4, consisting of three (3) compression molders and one (1) cooling table, constructed in 2004, with a maximum throughput of 105 pounds of rubber per hour, and exhausting to stack 23.
- (f) One (1) painting booth, identified as EU-6, utilizing cans of spray paint to apply coating to metal core bits, constructed in 2008, with a maximum throughput of 2.0 pounds of coating per hour (2 cans/hour, each can weighing 1 pound), using cartridge filters for particulate control, exhausting to stack 24.
- (g) One (1) rubber splicing/vulcanizing operation, identified as EU-7, with a total maximum capacity of 970 pounds of rubber per hour, no control, consisting of the following:
  - (1) Three (3) hydraulic platen press curing lines, constructed in 1997, 2000, and 2006, with a combined maximum capacity of 660 pounds of rubber per hour, and exhausting to the indoors.
  - (2) Twenty-four (24) pneumatic platen press curing tables, with a combined maximum capacity of 58 pounds of rubber per hour, uncontrolled, exhausting to the indoors, and consisting of the following:
    - (A) Ten (10) pneumatic platen press curing tables, constructed in 2004;

## DRAFT

- (B) Four (4) pneumatic platen press curing tables, constructed in 2012; and
- (C) Ten (10) pneumatic platen press curing tables, approved in 2019 for construction.
- (3) Five (5) manual platen press curing tables, constructed in 2000, with a combined maximum capacity of 276 pounds of rubber per hour, and exhausting to the indoors.
- (4) Used of a cutting lubricant containing VOC on the pneumatic platen press curing tables, approved in 2019, with a maximum capacity of 0.145 gallons per hour.
- (h) One (1) ink printing operation, identified as EU-8, consisting of eighteen (18) inkjet printers, printing ink serial barcodes on rubber gaskets and seals, with a combined maximum capacity of 0.0961 gallons of ink per hour, uncontrolled, exhausting to the indoors, and consisting of the following:
- (1) Sixteen (16) inkjet printers, constructed in 2002 and 2009; and
- (2) Two (2) inkjet printers, approved in 2019 for construction.
- (i) One (1) natural-gas fired grieve oven, identified as GO-1, constructed in 2004, approved in 2020 to reduce the maximum capacity, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and 1800 pounds of rubber per hour, exhausting to stack G-01.
- Extruded rubber materials from Lines 3 and 4 are cured in GO-1
- (j) One (1) rubber manufacturing process, identified as EU-9, approved for construction in 2013, with a maximum capacity of 2,057 pounds of rubber per hour, using a baghouse as control, and exhausting to the indoors.
- The rubber extrusion process (EU-2), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), hot air curing oven (GO-1), and rubber manufacturing process (EU-9) are considered as one facility.
- The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of Rubber Extrusion Lines 0 and 1 from EU-2, which totals to 1800 lbs/hr.
- (k) One (1) vacuum conveyance system, identified as V-1, constructed in 2019, approved in 2020 to change from PVC to TPV, with a maximum throughput of 750 pounds per hour of TPV, using a dust collector system as control, and exhausting indoors. V-1 delivers TPV to Line 2.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

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

- (a) In order to render the requirements of 326 IAC 6-3-2(d) not applicable to the painting booth (EU-6), the Permittee shall limit the coatings used in the painting booth (EU-6) to less than five gallons per day.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from V-1 shall not exceed 2.13 pounds per hour when operating at a process weight rate of 0.375 tons per hour. The pound per hour limitation was calculated with the following equation:

## DRAFT

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

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

### D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan is required for the painting booth (EU-6) and Vacuum Conveyance System (V-1) and their respective control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements [326 IAC 2-8-4(1)]

#### D.1.3 Particulate Control

---

In order to comply with Condition D.1.1(b), the dust collector system for particulate control shall be in operation and control emissions from the Vacuum Conveyance System (V-1) at all times V-1 is in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4(3)]

#### D.1.4 Semi-Annual Baghouse Inspections

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The Permittee shall perform semi-annual inspections of the Dust Collector System controlling particulate emissions from the Vacuum Conveyance System (V-1) to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.1.5 Broken or Failed Bag Detection

---

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

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.1.6 Record Keeping Requirement

---

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain daily records of the amount of coatings used in the painting booth (EU-6).
- (b) To document the compliance status with Condition D.1.4, the Permittee shall maintain

## DRAFT

records of the dates and results of the semi-annual inspections required under Condition D.1.4.

- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## DRAFT

### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (e) One (1) adhesive mixing table, identified as EU-5, constructed in 2004 and relocated to the painting booth (EU-6) in 2008, with a maximum throughput of 3.0 pounds of adhesive per hour, and exhausting to stack 24.

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

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

##### D.2.1 FESOP [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The input of any single HAP to the adhesives mixing operation (EU-5) shall be less than nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

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

#### Compliance Determination Requirements [326 IAC 2-8-4(1)]

##### D.2.3 HAP [326 IAC 2-1.1-11]

- (a) Compliance with the HAP content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with Condition D.2.1 shall be demonstrated no later than 30 days of the end of each month based on the total HAP-containing material usage for the twelve (12) consecutive month period.

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

##### D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.2.1.
- (1) The HAP content of each coating material and solvent used.

## DRAFT

- (2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total single HAP usage for each month; and
  - (4) The total single HAP usage for each compliance period.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### D.2.5 Reporting Requirements

---

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## DRAFT

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

##### Insignificant Activities

- (d) Three (3) natural-gas fired boilers, identified as B-1 through B-3, constructed in 2004, with a total maximum heat input of 0.289 MMBtu per hour, exhausting to stacks B-1 through B-3.
- (e) One (1) natural gas-fired boiler, identified as B-4, constructed in 2015, with a total maximum heat input capacity of 7.0 MMBtu per hour, no control, exhausting to stack B-4.

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

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

##### D.3.1 Particulate Emissions [326 IAC 6-2-4]

---

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the four (4) natural-gas fired boilers (identified as B-1 through B-4) shall each be limited to 0.6 pounds per MMBtu heat input.

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

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

Source Name: Press-Seal Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Press-Seal Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

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

# DRAFT

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

Page 2 of 2

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

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

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

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

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

## DRAFT

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

### FESOP Quarterly Report

Source Name: Press-Seal Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Adhesives Mixing Table (EU-5)  
Parameter: Single HAP  
Limit: 9.0 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

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

| Month | Column 1             | Column 2                     | Column 1 + Column 2      |
|-------|----------------------|------------------------------|--------------------------|
|       | This Month<br>(tons) | Previous 11 Months<br>(tons) | 12 Month Total<br>(tons) |
|       |                      |                              |                          |
|       |                      |                              |                          |
|       |                      |                              |                          |

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

# DRAFT

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

### FESOP Usage Report (Submit Report Quarterly)

Source Name: Press-Seal Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360  
Facility: Painting Booth (EU6)  
Parameter: Coating Usage  
Limit: In order to render the requirements of 326 IAC 6-3-2(d) not applicable to the painting booth (EU-6), the Permittee shall limit the coatings used in the painting booth (EU-6) to less than five gallons per day.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

| Day |  | Day |  |
|-----|--|-----|--|
| 1   |  | 17  |  |
| 2   |  | 18  |  |
| 3   |  | 19  |  |
| 4   |  | 20  |  |
| 5   |  | 21  |  |
| 6   |  | 22  |  |
| 7   |  | 23  |  |
| 8   |  | 24  |  |
| 9   |  | 25  |  |
| 10  |  | 26  |  |
| 11  |  | 27  |  |
| 12  |  | 28  |  |
| 13  |  | 29  |  |
| 14  |  | 30  |  |
| 15  |  | 31  |  |
| 16  |  |     |  |

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## DRAFT

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

Source Name: Press-Seal Corporation  
Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
FESOP Permit No.: F003-32125-00360

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

Page 1 of 2

|  |                               |
|--|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> |                               |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.   |                               |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD   |                               |
| <b>Permit Requirement</b> (specify permit condition #)   |                               |
| <b>Date of Deviation:</b>  | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>   |                               |
| <b>Probable Cause of Deviation:</b>  |                               |
| <b>Response Steps Taken:</b>   |                               |
| <b>Permit Requirement</b> (specify permit condition #)   |                               |
| <b>Date of Deviation:</b>  | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>   |                               |
| <b>Probable Cause of Deviation:</b>  |                               |
| <b>Response Steps Taken:</b>   |                               |

# DRAFT

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

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

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

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

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

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

|   |   |
|---|---|
| <b>Source Name:</b>                     | <b>Press-Seal Corporation</b>   |
| <b>Source Location:</b>                 | <b>2424 West State Boulevard, Fort Wayne, IN 46808</b>                |
| <b>County:</b>                          | <b>Allen</b>  |
| <b>SIC Code:</b>                        | <b>3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)</b> |
| <b>Operation Permit No.:</b>            | <b>F 003-32125-00360</b>  |
| <b>Operation Permit Issuance Date:</b>  | <b>December 3, 2012</b>   |
| <b>Significant Permit Revision No.:</b> | <b>003-43107-00360</b>  |
| <b>Permit Reviewer:</b>                 | <b>Olajumoke Kayode</b>   |

**Existing Approvals**

The source was issued FESOP Renewal No. 003-32125-00360 on December 3, 2012. The source has since received the following approvals:

| Permit Type                       | Permit Number   | Issuance Date     |
|-----------------------------------|-----------------|-------------------|
| FESOP Minor Permit Revision       | 003-33230-00360 | July 16, 2013     |
| FESOP Administrative Amendment    | 003-36978-00360 | May 5, 2016       |
| FESOP Significant Permit Revision | 003-40755-00360 | April 2, 2019     |
| FESOP Administrative Amendment    | 003-42278-00360 | February 21, 2020 |

**County Attainment Status**

The source is located in Allen County.

| Pollutant         | Designation  |
|-------------------|--|
| SO <sub>2</sub>   | Better than national standards.  |
| CO                | Unclassifiable or attainment effective November 15, 1990.  |
| O <sub>3</sub>    | Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.               |
| PM <sub>2.5</sub> | Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM <sub>2.5</sub> standard.     |
| PM <sub>2.5</sub> | Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM <sub>2.5</sub> standard. |
| PM <sub>10</sub>  | Unclassifiable effective November 15, 1990.  |
| NO <sub>2</sub>   | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO <sub>2</sub> standard.            |
| Pb                | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.                      |

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 Allen County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Allen County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

**Greenhouse Gas (GHG) Emissions**

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

**Source Status - Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

|   | Source-Wide Emissions Prior to Revision (ton/year) |                               |                                  |                 |                 |       |      |                         | Total HAPs |
|---|--|-------------------------------|----------------------------------|-----------------|-----------------|-------|------|-------------------------|------------|
|   | PM <sup>1</sup>                                    | PM <sub>10</sub> <sup>1</sup> | PM <sub>2.5</sub> <sup>1,2</sup> | SO <sub>2</sub> | NO <sub>x</sub> | VOC   | CO   | Single HAP <sup>3</sup> |            |
| <b>Total PTE of Entire Source Excluding Fugitive Emissions*</b> | 8.29   | 8.55                          | 8.55                             | 0.03            | 4.66            | 41.52 | 3.92 | 9.00<br>(Toluene)       | 24.63      |

| Source-Wide Emissions Prior to Revision (ton/year) |                 |                               |                                  |                 |                 |     |     |                         |            |
|--|-----------------|-------------------------------|----------------------------------|-----------------|-----------------|-----|-----|-------------------------|------------|
|  | PM <sup>1</sup> | PM <sub>10</sub> <sup>1</sup> | PM <sub>2.5</sub> <sup>1,2</sup> | SO <sub>2</sub> | NO <sub>x</sub> | VOC | CO  | Single HAP <sup>3</sup> | Total HAPs |
| Title V Major Source Thresholds                    | NA              | 100                           | 100                              | 100             | 100             | 100 | 100 | 10                      | 25         |
| PSD Major Source Thresholds                        | 250             | 250                           | 250                              | 250             | 250             | 250 | 250 | --                      | --         |

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."  
<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>3</sup>Single highest source-wide HAP  
 \*Fugitive HAP emissions are always included in the source-wide emissions.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of Administrative Amendment No. 003-42278-00360, issued on February 21, 2020.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Press-Seal Corporation on August 3, 2020, relating to the following:

- (a) Modifications to extrusion process (EU-2), as follows:
  - (1) EU-02 will no longer process PVC. It will only process rubber materials;
  - (2) Add a new rubber extrusion line, identified as Line 0;
  - (3) Remove the PVC extruder (EU-10);
  - (4) For clarity, separate the two existing rubber microwave extrusion lines as Lines 3 and 4 and reduce their combined maximum capacity from 3750 lb/hr to 1,800 lb/hr;
  - (5) Clarify that the throughput of the salt and water bath curing lines are not part of the throughput of the microwave extrusion process (see revision (d) below).

One (1) extrusion process, identified as EU-2, constructed in 2004, **and approved in 2020 to process rubber materials only**, ~~exhausting to stacks 16 and 17, using no control~~, and consisting of the following:

| Emission Unit ID | Extrusion type                          | Maximum Throughput (lbs/hr) | Exhaust stack    |
|------------------|---|-----------------------------|------------------|
| Line 0*          | Rubber Extrusion with N02/N03 Salt Bath | 900                         | Stacks 25 and 26 |

| Emission Unit ID                            | Extrusion type                          | Maximum Throughput (lbs/hr) | Exhaust stack            |
|---|---|-----------------------------|--------------------------|
| Rubber Extruder (Line 1)                    | Rubber Extrusion with NO2/NO3 Salt Bath | 900                         | Stacks 16, 17, 18 and 20 |
| Polyvinyl Chloride (PVC) extruder (EU-10)** |   | 750                         |                          |
| Two (2) Microwave Rubber curing lines       |   | 3750*                       |                          |
| Line 3                                      | Rubber Extrusion with Microwave         | 900                         |                          |
| Line 4                                      | Rubber Extrusion with Microwave         | 900                         |                          |
|   |   |                             |                          |

\*Total throughput includes salt and water bath curing lines from EU-3.

\*\* This changed in 2020 from rubber extruder to PVC extruder.

\*Approved in 2020 for construction

Lines 0 and 1 will go through a NO2/NO3 salt bath cure only;

Lines 3 and 4 only go through the Hot Air Curing (GO-1) process.

- (b) Removal of the existing extrusion process identified as EU-3:

~~One (1) extrusion process, identified as EU-3, constructed in 2004 and amended in 2020, exhausting to stacks 18, 20, 21, and 22; consisting of the following:~~

| Emission Unit            | Maximum Throughput (lbs/hr) |
|--------------------------|-----------------------------|
| Rubber Extruder (Line 1) | 900                         |
| Rubber Extruder (Line 2) | 900                         |
| Salt Bath curing line    | 3750*                       |
| Water Bath curing line   |                             |

\*Total throughput includes microwave rubber curing line from EU-2.

- (c) Addition of a new plastic extrusion process as follows:

**One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, approved in 2020 for construction, with a maximum throughput of 750 lbs/hr, using no control, and exhausting to stacks 21 and 22.**

*Note: The existing vacuum conveyance system, identified as V-1 used to deliver PVC and will now deliver TPV to Line 2, with no changes in throughput and potential emissions.*

One (1) vacuum conveyance system, identified as V-1, constructed in 2019, **approved in 2020 to change from PVC to TPV**, with a maximum throughput of 750 pounds per hour of TPV, using a dust collector system as control, and exhausting indoors. V-1 delivers TPV to **Line 2**.

- (d) Revision of the calculations for GO-1 to indicate that not all rubber lines go through the Curing (GO-1) process.

Lines 0 and 1 will go through a NO2/NO3 salt bath cure only, while Lines 3 and 4 only go through the Hot Air Cure GO-1 process. Therefore, the total throughput that goes through Curing (GO-1) operation reduces from 3750 lbs/hr to 1800 lbs./hr, i.e. 900 lbs. per line per hour.

One (1) natural-gas fired grieve oven, identified as GO-1, constructed in 2004, **approved in 2020 to reduce the maximum capacity**, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and ~~3750~~ **1800** pounds of rubber per hour, exhausting to stack G-

01.

**Extruded rubber materials from Lines 3 and 4 are cured in GO-1.**

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Permit Level Determination – FESOP Significant Permit Revision**

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

|   | <b>PTE Increases Due to the Revision (ton/year)</b> |                        |                                     |                       |                       |             |           |                               |                   |
|---|---|------------------------|-------------------------------------|-----------------------|-----------------------|-------------|-----------|-------------------------------|-------------------|
|   | <b>PM</b>   | <b>PM<sub>10</sub></b> | <b>PM<sub>2.5</sub><sup>1</sup></b> | <b>SO<sub>2</sub></b> | <b>NO<sub>x</sub></b> | <b>VOC</b>  | <b>CO</b> | <b>Single HAP<sup>2</sup></b> | <b>Total HAPs</b> |
| Total PTE Before Controls of the New Rubber extrusion Line 0                        | Negl.*  | Negl.*                 | Negl.*                              | -                     | -                     | 0.12        | -         | 0.01<br>(Tetrachloroethane)   | 0.03              |
| Total PTE Before control of the new plastic extrusion Line 2                        | 0.10  | 0.10                   | 0.10                                | -                     | -                     | 0.12        | -         | -                             | -                 |
| Total PTE Increase of the Modified Emission Unit(s)/Process (Hot Air Curing (GO-1)) | -   | -                      | -                                   | -                     | -                     | 0.00        | -         | 0.00                          | 0.00              |
| <b>Total PTE of the Revision</b>  | <b>0.10</b>   | <b>0.10</b>            | <b>0.10</b>                         | <b>-</b>              | <b>-</b>              | <b>0.24</b> | <b>-</b>  | <b>0.01</b>                   | <b>0.03</b>       |

<sup>1</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>2</sup>Single highest HAP.

\*Negligible

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(l), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision removes or reduces compliance monitoring, testing, record keeping, reporting, or its frequency.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

|   | Source-Wide Emissions After Issuance (ton/year) |                               |                                   |                 |                 |       |      |                         |            |
|---|---|-------------------------------|-----------------------------------|-----------------|-----------------|-------|------|-------------------------|------------|
|   | PM <sup>1</sup>                                 | PM <sub>10</sub> <sup>1</sup> | PM <sub>2.5</sub> <sup>1, 2</sup> | SO <sub>2</sub> | NO <sub>x</sub> | VOC   | CO   | Single HAP <sup>3</sup> | Total HAPs |
| <b>Total PTE of Entire Source Excluding Fugitives*</b>  | 8.29  | 8.55                          | 8.55                              | 0.03            | 4.66            | 42.15 | 3.92 | 9.00<br>(Toluene)       | 21.85      |
| Title V Major Source Thresholds   | NA  | 100                           | 100                               | 100             | 100             | 100   | 100  | 10                      | 25         |
| PSD Major Source Thresholds   | 250   | 250                           | 250                               | 250             | 250             | 250   | 250  | --                      | --         |
| <sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant."<br><sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .<br><sup>3</sup> Single highest source-wide HAP<br>*Fugitive HAP emissions are always included in the source-wide emissions. |   |                               |                                   |                 |                 |       |      |                         |            |

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

- (a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).
- (b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

Due to the proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

- (a) The requirements of the New Source Performance Standard for VOC Emissions from the Polymer Manufacturing Industry (40 CFR 60, Subpart DDD) are not included in the permit, because the source does not manufacture polymers as defined in this subpart.
- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production at Area Sources (40 CFR 63, Subpart DDDDDD) are not

included in the permit, because the source does not manufacture PVC or copolymers as defined in this subpart.

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production (40 CFR 63, Subpart HHHHHHH) are not included in the permit, because the source does not manufacture PVC or copolymers as defined in this subpart and this source is not a major source of HAPs.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed revision.

**Compliance Assurance Monitoring (CAM):**

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

|   |
|---|
| <b>State Rule Applicability - Entire Source</b> |
|---|

Due to this revision, state rule applicability has been reviewed as follows:

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The new and modified emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)**

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Allen County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

**326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)**

Pursuant to 326 IAC 6.8-10-1, this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

|   |
|---|
| <b>State Rule Applicability – Individual Facilities</b> |
|---|

Due to the proposed revision, state rule applicability has been reviewed as follows:

New rubber extrusion Line 0

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(14), the new rubber extrusion Line 0 in EU-2 is not subject to the requirements of 326 IAC 6-3, since it is a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Even though, the rubber extrusion Line 0 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

New plastic extrusion Line 2

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(14), the new plastic extrusion Line 2 is not subject to the requirements of 326 IAC 6-3, since it is a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Even though, the plastic extrusion Line 2 was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Extrusion process (EU-2) and natural-gas fired grieve oven (GO-1)

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

IDEM had previously determined that the following:

- (a) rubber extrusion process (EU-2)
- (b) rubber extrusion process (EU-3),
- (c) rubber splicing/vulcanizing operation (EU-7),
- (d) ink printing operation (EU-8), and
- (e) hot air curing oven (GO-1)

were one facility because the rubber products that are extruded in lines EU-2 and EU-3 are cured in the microwave extruder, salt baths, hot air curing oven (GO-1), and the splicing/vulcanizing operation (EU-7). In addition, the rubber products that are extruded in lines EU-2 and EU-3 have serial barcodes printed on

them in the ink printing operation (EU-8).

Prior to this application, the combined unlimited VOC potential emissions from the above mentioned operations were greater than twenty-five (25) tons per year.

With the modifications made as indicated in this application that not all rubber lines go through the Curing (GO-1) process, and subsequent reduction of the total throughput that goes through Curing (GO-1) operation from 3750 lbs/hr to 1800 lbs/hr, the combined unlimited VOC potential emissions from the following:

- (a) rubber extrusion process (EU-2)
- (b) rubber splicing/vulcanizing operation (EU-7),
- (c) ink printing operation (EU-8), and
- (d) hot air curing oven (GO-1)

are now less than 25 tons per year. Therefore, even though these are still considered as one facility the existing 326 IAC 8-1-6 avoidance limit for this source is no longer needed and will be removed from the permit.

**Compliance Determination and Monitoring Requirements**

There are no new or modified compliance requirements included with this revision.

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) IDEM, OAQ has added new emission units to the permit
- (2) IDEM, OAQ has removed emission units from the permit
- (3) IDEM, OAQ has removed the 326 IAC 8-1-6 avoidance limit and associated compliance determination, record keeping and reporting requirements the rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), and hot air curing oven (GO-1) from the permit

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

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

- .....
- (b) One (1) extrusion process, identified as EU-2, constructed in 2004 and ~~amended~~ **approved** in 2020 **to process rubber materials only**, ~~exhausting to stacks 16 and 17,~~ and consisting of the following:

| <del>Emission Unit ID</del>                            | <b>Extrusion type</b>                          | <b>Maximum Throughput (lbs/hr)</b> | <b>Exhaust stack</b>            |
|--|--|------------------------------------|---------------------------------|
| <b>Line 0*</b>   | <b>Rubber Extrusion with N02/N03 Salt Bath</b> | <b>900</b>                         | <b>Stacks 25 and 26</b>         |
| <del>Rubber Extruder (Line 1)</del>                    | <b>Rubber Extrusion with N02/N03 Salt Bath</b> | 900                                | <b>Stacks 16, 17, 18 and 20</b> |
| <del>Polyvinyl Chloride (PVC) extruder (EU-10)**</del> |  | 750                                |                                 |

| Emission Unit ID                                 | Extrusion type                         | Maximum Throughput (lbs/hr) | Exhaust stack |
|--|--|-----------------------------|---------------|
| <del>Two (2) Microwave Rubber curing lines</del> |  | <del>3750*</del>            |               |
| <b>Line 3</b>                                    | <b>Rubber Extrusion with Microwave</b> | <b>900</b>                  |               |
| <b>Line 4</b>                                    | <b>Rubber Extrusion with Microwave</b> | <b>900</b>                  |               |

\*Total throughput includes salt and water bath curing lines from EU-3.

\*\* This changed in 2020 from rubber extruder to PVC extruder.

\*approved in 2020 for construction

Lines 0 and 1 will go through a NO2/NO3 salt bath cure only;

Lines 3 and 4 only go through the Hot Air Curing (GO-1) process.

- (c) ~~One (1) extrusion process, identified as EU-3, constructed in 2004 and amended in 2020, exhausting to stacks 18, 20, 21, and 22; consisting of the following:~~

| Emission Unit            | Maximum Throughput (lbs/hr) |
|--------------------------|-----------------------------|
| Rubber Extruder (Line 1) | 900                         |
| Rubber Extruder (Line 2) | 900                         |
| Salt Bath curing line    | 3750*                       |
| Water Bath curing line   |                             |

\*Total throughput includes microwave rubber curing line from EU-2.

- (c) **One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, approved in 2020 for construction, with a maximum throughput of 750 lbs/hr, and exhausting to stacks 21 and 22.**

- .....  
 (i) One (1) natural-gas fired grieve oven, identified as GO-1, constructed in 2004, approved in 2020 to decrease the maximum capacity, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and ~~3750~~ **1800** pounds of rubber per hour, exhausting to stack G-01.

**Extruded rubber materials from Lines 3 and 4 are cured in GO-1.**

- (j) One (1) rubber manufacturing process, identified as EU-9, approved for construction in 2013, with a maximum capacity of 2,057 pounds of rubber per hour, using a baghouse as control, and exhausting to the indoors.

The rubber extrusion process (EU-2 ~~and EU-3~~), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), hot air curing oven (GO-1), and rubber manufacturing process (EU-9) are considered as one facility.

The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of ~~microwave rubber curing~~ **Rubber Extrusion Lines 0 and 1** from EU-2 ~~and the salt/water bath curing lines from EU-3~~, which totals to ~~3750~~ **1800** lbs/hr.

- (k) One (1) vacuum conveyance system, identified as V-1, constructed in 2019, **approved in 2020 to change from PVC to TPV**, with a maximum throughput of 750 pounds per hour of ~~PVC~~ **TPV**, using a dust collector system as control, and exhausting indoors. V-1 delivers ~~PVC~~ **TPV** to EU-4 ~~Line 2~~.

Emissions Unit Description:

- .....
- (b) One (1) extrusion process, identified as EU-2, constructed in 2004 and amended approved in 2020 to process rubber materials only, exhausting to stacks 16 and 17, and consisting of the following:

| Emission Unit ID                            | Extrusion type                          | Maximum Throughput (lbs/hr) | Exhaust stack            |
|---|---|-----------------------------|--------------------------|
| Line 0*                                     | Rubber Extrusion with N02/N03 Salt Bath | 900                         | Stacks 25 and 26         |
| Rubber Extruder (Line 1)                    | Rubber Extrusion with N02/N03 Salt Bath | 900                         | Stacks 16, 17, 18 and 20 |
| Polyvinyl Chloride (PVC) extruder (EU 10)** |   | 750                         |                          |
| Two (2) Microwave Rubber curing lines       |   | 3750*                       |                          |
| Line 3                                      | Rubber Extrusion with Microwave         | 900                         |                          |
| Line 4                                      | Rubber Extrusion with Microwave         | 900                         |                          |

\*Total throughput includes salt and water bath curing lines from EU-3.

\*\* This changed in 2020 from rubber extruder to PVC extruder.

\*approved in 2020 for construction

Lines 0 and 1 will go through a NO2/NO3 salt bath cure only;

Lines 3 and 4 only go through the Hot Air Curing (GO-1) process.

- (c) One (1) extrusion process, identified as EU-3, constructed in 2004 and amended in 2020, exhausting to stacks 18, 20, 21, and 22; consisting of the following:

| Emission Unit            | Maximum Throughput (lbs/hr) |
|--------------------------|-----------------------------|
| Rubber Extruder (Line 1) | 900                         |
| Rubber Extruder (Line 2) | 900                         |
| Salt Bath curing line    | 3750*                       |
| Water Bath curing line   |                             |

\*Total throughput includes microwave rubber curing line from EU-2.

- (c) One (1) plastic extrusion process, processing thermoplastic vulcanizate (TPV), identified as Line 2, approved in 2020 for construction, with a maximum throughput of 750 lbs/hr, and exhausting to stacks 21, and 22.

- .....
- (i) One (1) natural-gas fired grieve oven, identified as GO-1, constructed in 2004, approved in 2020 to reduce the maximum capacity, for hot air curing, with a maximum heat input of 0.4 MMBtu per hour and ~~3750~~ 1800 pounds of rubber per hour, exhausting to stack G-01.

**Extruded rubber materials from Lines 3 and 4 are cured in GO-1.**

- (j) One (1) rubber manufacturing process, identified as EU-9, approved for construction in 2013, with a maximum capacity of 2,057 pounds of rubber per hour, using a baghouse as control, and exhausting to the indoors.

The rubber extrusion process (EU-2 and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), hot air curing oven (GO-1), and rubber manufacturing process (EU-9) are considered as one facility.

The Unlimited throughput (lbs/hr) of the hot air curing oven is a combination of microwave rubber curing **Rubber Extrusion Lines 0 and 1** from EU-2 and the salt/water bath curing lines from EU-3, which totals to 3750 **1800** lbs/hr.

- (k) One (1) vacuum conveyance system, identified as V-1, constructed in 2019, **approved in 2020 to change from PVC to TPV** with a maximum throughput of 750 pounds per hour of **PVC TPV**, using a dust collector system as control, and exhausting indoors. V-1 delivers **PVC TPV** to EU-10 **Line 2**.

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

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

##### ~~D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

~~In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:~~

- ~~(a) The total combined amount of rubber processed in the rubber extrusion process (EU-2\* and EU-3) shall be not exceed 26,390,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.~~
- ~~(b) The VOC emissions from the rubber extrusion process (EU-2\* and EU-3) shall not exceed 0.0000297 pounds per pound of rubber processed.~~
- ~~(c) The total amount of rubber processed in the hot air curing grievie oven (GO-1) shall be not exceed 15,000,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.~~
- ~~(d) The VOC emissions from the hot air curing grievie oven (GO-1) shall not exceed 0.00136 pounds per pound of rubber processed.~~

~~Compliance with these limits combined with the unlimited potential to emit VOC from the rubber splicing/vulcanizing operation (EU-7) and ink printing operation (EU-8), shall limit the combined potential to emit VOC from the rubber extrusion process (EU-2\* and EU-3), rubber splicing/vulcanizing operation (EU-7), ink printing operation (EU-8), hot air curing oven (GO-1), and rubber manufacturing process (EU-9) to less than twenty five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.~~

~~\*EU-10, which is part of the EU-2 process, produces PVC and does not produce rubber. Therefore, EU-10 is not included in this limit.~~

##### ~~D.1.2-1 Particulate [326 IAC 6-3-2]~~

##### ~~D.1.3 2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

##### ~~Compliance Determination Requirements [326 IAC 2-8-4(1)]~~

##### ~~D.1.4 VOC Emissions~~

~~In order to determine compliance with Condition D.1.1, the Permittee shall use the following equation to determine the tons of VOC emitted per twelve (12) consecutive month period:~~

~~(a) VOC emission calculation~~  
~~VOC = Limited VOC emissions from the rubber extrusion process (EU-2\* and EU-3)~~  
~~+ Limited VOC emissions from the rubber hot air curing griever oven (GO-1)~~  
~~+ Unlimited VOC emissions from rubber splicing/vulcanizing (EU-7)~~  
~~+ Unlimited VOC emissions from ink printing operation (EU-8)~~  
~~+ Unlimited VOC emissions from rubber manufacturing process (EU-9)~~  
~~+ Unlimited VOC emissions from usage of cutting lubricant~~

~~Where:~~

~~Limited VOC emissions from the rubber extrusion process (EU-2\* and EU-3) =~~  
~~Limited throughput (lb/hr) X 0.0000297 lb/lb rubber X 1 ton/2000lb~~

~~Limited VOC emissions from the rubber hot air curing griever oven (GO-1) =~~  
~~Limited throughput (lb/hr) X 0.00136 lb/lb rubber X 1 ton/2000lb~~

~~Unlimited VOC emissions from the rubber splicing/vulcanizing (EU-7) = 4.00~~  
~~tons/year~~

~~Unlimited VOC emissions from the ink printing operation (EU-8) = 2.59 tons/year~~

~~Unlimited VOC emissions from the rubber manufacturing process (EU-9) = 0.35~~  
~~tons/year~~

~~Unlimited VOC emissions from usage of cutting lubricant = 4.14 tons/year~~

~~\*EU-10, which is part of the EU-2 process, produces PVC and does not produce rubber.~~  
~~Therefore, EU-10 is not included in this limit~~

Compliance Determination Requirements [326 IAC 2-8-4(1)]

~~D.1.5 3 Particulate Control~~

~~In order to comply with Condition D.1.2 1(b), the dust collector system for particulate control shall be in operation and control emissions from the Vacuum Conveyance System (V-1) at all times V-1 is in operation.~~

Compliance Monitoring Requirements [326 IAC 2-8-4(3)]

~~D.1.6 4 Semi-Annual Baghouse Inspections~~

~~D.1.7 5 Broken or Failed Bag Detection~~

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

~~D.1.8 6 Record Keeping Requirement~~

~~(a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain monthly records of the amount of rubber processed in the rubber extrusion process (EU-2\* and EU-3).~~

~~(b) To document the compliance status with Condition D.1.1(c), the Permittee shall maintain monthly records of the amount of rubber processed in the hot air curing griever oven (GO-1).~~

~~(e a) To document the compliance status with Condition D.1.2 1, the Permittee shall maintain~~

daily records of the amount of coatings used in the painting booth (EU-6).

- (d b) To document the compliance status with Condition D.1.6 4, the Permittee shall maintain records of the dates and results of the semi-annual inspections required under Condition D.1.6 4.
- (e c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

~~\*EU-10, which is part of the EU-2 process, produces PVC and does not produce rubber. Therefore, EU-10 is not included in this limit.~~

**D.1.9 7 Reporting Requirements**

A quarterly summary of the information to document the compliance status with Conditions ~~D.1.1(a), D.1.1(c), and D.1.2 1~~ shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

.....

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

**FESOP Quarterly Report**

Source Name: Press-Seal Corporation  
 Source Address: 2424 West State Blvd., Fort Wayne, Indiana 46808  
 FESOP Permit No.: F003-32125-00360  
 Facility: Rubber Extrusion Process (EU-2 and EU-3)  
 Parameter: Rubber Usage  
 Limit: The total combined amount of rubber processed in the rubber extrusion process (EU-2\* and EU-3) shall be not exceed 26,390,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

~~\*EU-10, which is part of the EU-2 process, produces PVC and does not produce rubber. Therefore, EU-10 is not included in this limit.~~

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

| Month | Column 1            | Column 2                    | Column 1 + Column 2     |
|-------|---------------------|-----------------------------|-------------------------|
|       | This Month (pounds) | Previous 11 Months (pounds) | 12 Month Total (pounds) |
|       |                     |                             |                         |
|       |                     |                             |                         |
|       |                     |                             |                         |

|  |  |  |  |
|--|--|--|--|
|  |  |  |  |
|--|--|--|--|

\_\_\_\_\_  No deviation occurred in this quarter.

\_\_\_\_\_  Deviation/s occurred in this quarter.

\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

**FESOP Quarterly Report**

Source Name: ~~Press Seal Corporation~~  
 Source Address: ~~2424 West State Blvd., Fort Wayne, Indiana 46808~~  
 FESOP Permit No.: ~~F003-32125-00360~~  
 Facility: ~~Hot Air Curing Grieve Oven (GO-1)~~  
 Parameter: ~~Rubber Usage~~  
 Limit: ~~The total amount of rubber processed in the hot air curing grievae oven (GO-1) shall be not exceed 15,000,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

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

| Month | Column 1               | Column 2                       | Column 1 + Column 2        |
|-------|------------------------|--------------------------------|----------------------------|
|       | This Month<br>(pounds) | Previous 11 Months<br>(pounds) | 12 Month Total<br>(pounds) |
|       |                        |                                |                            |
|       |                        |                                |                            |
|       |                        |                                |                            |

~~\_\_\_\_\_  No deviation occurred in this quarter.~~

~~\_\_\_\_\_  Deviation/s occurred in this quarter.~~

~~\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_~~

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 3, 2020.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 003-43107-00360. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

|                     |
|---------------------|
| <b>IDEM Contact</b> |
|---------------------|

- (a) If you have any questions regarding this permit, please contact Olajumoke Kayode, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5373 or (800) 451-6027, and ask for Olajumoke Kayode or (317) 234-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

**Company Name: Press-Seal Corporation**  
**Address: 2424 West State Blvd, Fort Wayne, IN 46808**  
**Permit Number: F003-32125-00360**  
**Significant Permit Revision No.: 003-43107-00360**  
**Reviewer: Olajumoke Kayode**

| Unlimited Potential to Emit (tons/year) |              |              |              |             |             |              |             |              |                         |
|---|--------------|--------------|--------------|-------------|-------------|--------------|-------------|--------------|-------------------------|
| Emission Unit                           | PM           | PM10         | PM2.5        | SO2         | NOx         | VOC          | CO          | Total HAPs   | Worst Single HAP        |
| Rubber Molding (EU-1 & EU-4)            | -            | -            | -            | -           | -           | 4.65         | -           | 3.66         | 2.71 Carbon Disulfide   |
| Plastic Extrusion (EU-10)               | 0.102        | 0.102        | 0.102        | -           | -           | 0.12         | -           | -            | -                       |
| Plastic Pellet Handling                 | 2.628        | 2.628        | 2.628        | -           | -           | -            | -           | -            | -                       |
| Rubber Extrusion (EU-2 & EU-3)          | 0.001        | 0.001        | 0.001        | -           | -           | 0.47         | -           | 0.11         | 0.03 Tetrachloroethane  |
| Curing                                  | -            | -            | -            | -           | -           | 10.72        | -           | 2.59         | 0.80 Tetrachloroethane  |
| Rubber Splicing/Vulcanizing (EU-7)      | -            | -            | -            | -           | -           | 4.00         | -           | 3.15         | 2.33 Carbon Disulfide   |
| Ink Printing Operation (EU-8)           | -            | -            | -            | -           | -           | 2.59         | -           | 1.39         | 1.17 Methanol           |
| Rubber Manufacturing (EU-9)             | 3.62         | 3.62         | 3.62         | -           | -           | 0.35         | -           | 0.12         | 0.037 Tetrachloroethane |
| Adhesives Mixing (EU-5)                 | -            | -            | -            | -           | -           | 13.14        | -           | 10.75        | 10.75 Toluene           |
| Paint Booth (EU-6)                      | 4.38         | 4.38         | 4.38         | -           | -           | 1.59         | -           | -            | -                       |
| Natural Gas Combustion                  | 0.09         | 0.35         | 0.35         | 0.03        | 4.66        | 0.26         | 3.92        | 0.09         | 0.084 Hexane            |
| Plastic Injection (PI-01 through PI-04) | 0.09         | 0.09         | 0.09         | -           | 0.00004     | 0.12         | 0.001       | 0.0012       | 0.00083 Propionaldehyde |
| Cutting Lubricant                       | -            | -            | -            | -           | -           | 4.14         | -           | -            | -                       |
| <b>Total Emissions</b>                  | <b>10.91</b> | <b>11.18</b> | <b>11.18</b> | <b>0.03</b> | <b>4.66</b> | <b>42.15</b> | <b>3.92</b> | <b>21.85</b> | <b>10.75 Toluene</b>    |

| Limited Potential to Emit (tons/year)   |             |             |             |             |             |              |             |              |                         |
|---|-------------|-------------|-------------|-------------|-------------|--------------|-------------|--------------|-------------------------|
| Emission Unit                           | PM          | PM10        | PM2.5       | SO2         | NOx         | VOC          | CO          | Total HAPs   | Worst Single HAP        |
| Rubber Molding (EU-1 & EU-4)            | -           | -           | -           | -           | -           | 4.65         | -           | 3.66         | 2.71 Carbon Disulfide   |
| Plastic Extrusion (EU-10)               | 0.102       | 0.102       | 0.102       | -           | -           | 0.12         | -           | -            | -                       |
| Plastic Pellet Handling                 | 0.003       | 0.003       | 0.003       | -           | -           | -            | -           | -            | -                       |
| Rubber Extrusion (EU-2 & EU-3)          | 0.001       | 0.001       | 0.001       | -           | -           | 0.47         | -           | 0.11         | 0.03 Tetrachloroethane  |
| Curing                                  | -           | -           | -           | -           | -           | 10.72        | -           | 2.59         | 0.76 Tetrachloroethane  |
| Rubber Splicing/Vulcanizing (EU-7)      | -           | -           | -           | -           | -           | 4.00         | -           | 3.15         | 2.33 Carbon Disulfide   |
| Ink Printing Operation (EU-8)           | -           | -           | -           | -           | -           | 2.59         | -           | 1.39         | 1.17 Methanol           |
| Rubber Manufacturing (EU-9)             | 3.62        | 3.62        | 3.62        | -           | -           | 0.35         | -           | 0.12         | 0.04 Tetrachloroethane  |
| Paint Booth (EU-6)                      | 4.38        | 4.38        | 4.38        | -           | -           | 1.59         | -           | -            | -                       |
| Adhesives Mixing (EU-5)*                | -           | -           | -           | -           | -           | 13.14        | -           | 10.75        | 9.00 Toluene            |
| Natural Gas Combustion                  | 0.09        | 0.35        | 0.35        | 0.03        | 4.66        | 0.26         | 3.92        | 0.09         | 0.08 Hexane             |
| Plastic Injection (PI-01 through PI-04) | 0.09        | 0.09        | 0.09        | -           | 0.00004     | 0.12         | 0.001       | 0.0012       | 0.00083 Propionaldehyde |
| Cutting Lubricant                       | -           | -           | -           | -           | -           | 4.14         | -           | -            | -                       |
| <b>Total Emissions</b>                  | <b>8.29</b> | <b>8.55</b> | <b>8.55</b> | <b>0.03</b> | <b>4.66</b> | <b>42.15</b> | <b>3.92</b> | <b>21.85</b> | <b>9.00 Toluene</b>     |

\* Single HAP emissions have been limited to less than 9.0 tons per year in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

**Appendix A: Emissions Calculations  
SPR Summary**

Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit Number: F003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode

**New units**

| Process/Emission Unit      | Uncontrolled Potential To Emit (tons/yr) |                  |                   |                 |                 |             |             |             | Worst Case Single HAP |                           |
|----------------------------|--|------------------|-------------------|-----------------|-----------------|-------------|-------------|-------------|-----------------------|---------------------------|
|                            | PM                                       | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NO <sub>x</sub> | VOC         | CO          | Total HAPs  |                       |                           |
| EU Rubber Extrusion Line 0 | -  | -                | -                 | -               | -               | 0.12        | -           | 0.03        | 0.01                  | Tetrachloro-ethane        |
| Plastic extrusion Line 2   | 0.10                                     | 0.10             | 0.10              | -               | -               | 0.12        | -           | -           | -                     |                           |
| <b>Totals</b>              | <b>0.10</b>                              | <b>0.10</b>      | <b>0.10</b>       | <b>0.00</b>     | <b>0.00</b>     | <b>0.24</b> | <b>0.00</b> | <b>0.03</b> | <b>0.01</b>           | <b>Tetrachloro-ethane</b> |

**Curing (GO-1) - PTE with previous maximum throughput of 3650 lbs/hr**

| Emission Unit         | PTE of Each Emissions Unit Prior to the Modification (tons/yr) |                  |                     |                 |                 |       |    |            | Worst Case Single HAP |                    |
|-----------------------|--|------------------|---------------------|-----------------|-----------------|-------|----|------------|-----------------------|--------------------|
|                       | PM   | PM <sub>10</sub> | PM <sub>2.5</sub> * | SO <sub>2</sub> | NO <sub>x</sub> | VOC   | CO | Total HAPs |                       |                    |
| Hot Air Curing (GO-1) | -  | -                | -                   | -               | -               | 22.34 | -  | 5.39       | 1.66                  | Tetrachloro-ethane |

**Revised Curing (GO-1) - PTE with a new maximum throughput of 1800 lbs/hr**

| Emission Unit         | PTE of Each Emissions Unit After the Modification (tons/yr) |                  |                     |                 |                 |       |    |            | Worst Case Single HAP |                    |
|-----------------------|---|------------------|---------------------|-----------------|-----------------|-------|----|------------|-----------------------|--------------------|
|                       | PM  | PM <sub>10</sub> | PM <sub>2.5</sub> * | SO <sub>2</sub> | NO <sub>x</sub> | VOC   | CO | Total HAPs |                       |                    |
| Hot Air Curing (GO-1) | -   | -                | -                   | -               | -               | 10.72 | -  | 2.59       | 0.80                  | Tetrachloro-ethane |

**PTE Increase from Curing (GO-1)**

| Emission Unit                   | PTE Increase of the Modification (tons/yr) (Sum of the PTE Increased of Each Emission Unit) |                  |                     |                 |                 |     |    |            | Worst Case Single HAP |   |
|---------------------------------|---|------------------|---------------------|-----------------|-----------------|-----|----|------------|-----------------------|---|
|                                 | PM  | PM <sub>10</sub> | PM <sub>2.5</sub> * | SO <sub>2</sub> | NO <sub>x</sub> | VOC | CO | Total HAPs |                       |   |
| Total PTE Increase of Revision: | -   | -                | -                   | -               | -               | -   | -  | -          | -                     | - |

|  |   |   |   |   |   |             |   |             |             |                           |
|--|---|---|---|---|---|-------------|---|-------------|-------------|---------------------------|
| <b>Total PTE Increases Due to the Revision</b> | - | - | - | - | - | <b>0.24</b> | - | <b>0.03</b> | <b>0.01</b> | <b>Tetrachloro-ethane</b> |
|--|---|---|---|---|---|-------------|---|-------------|-------------|---------------------------|

**Appendix A: Emissions Calculations  
Rubber and Compression Molding (EU-1 and EU-4)**

**Company Name: Press-Seal Corporation**

**Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

**Unlimited Emissions**

| Process                                      | Unlimited Throughput (lbs/hr) | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Carbon Disulfide EF (lb/lb Rubber) | Unlimited VOC Emissions (ton/yr) | Unlimited Total HAPs Emissions (ton/yr) | Unlimited Carbon Disulfide Emissions (ton/yr) |
|--|-------------------------------|-----------------------|------------------------------|------------------------------------|----------------------------------|---|---|
| Rubber and Compression Molding (EU-1 & EU-4) | 1155                          | 9.19E-04              | 7.23E-04                     | 5.35E-04                           | 4.65                             | 3.66                                    | 2.71  |
| <b>Total</b>                                 |                               |                       |                              |                                    | <b>4.65</b>                      | <b>3.66</b>                             | <b>2.71</b>                                   |

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput = 750 + 105 = 855 pounds/hour

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Plastic Extrusion**

**Company Name: Press-Seal Corporation  
Address: 24242 West State Blvd, Fort Wayne, IN 46807  
Permit No. 003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode**

**Unlimited Emissions**

| Process                        | Unlimited Throughput (lbs/hr) | Unlimited Throughput (TPY) | PM EF (lb/ton Resin) | VOC EF (lb/tons Resin) | Unlimited PM Emissions (ton/yr) | Unlimited VOC Emissions (ton/yr) |
|--------------------------------|-------------------------------|----------------------------|----------------------|------------------------|---------------------------------|----------------------------------|
| Plastic Extrusion EU-3 (TPV)** | 750                           | 3285                       | 0.06                 | 0.0706                 | 0.1015                          | 0.12                             |
| <b>Total</b>                   |                               |                            |                      |                        | <b>0.1015</b>                   | <b>0.12</b>                      |

**Methodology**

Potential VOC Emissions = (Maximum Capacity (lb)) / 2000 \*(Emission Factor)\* 8760 hrs/yr / 2000 lb/ton

Polyethylene emission factor is worst case Low Density Polyethylene extrusion coating at 500 degrees F. which is 35 lb VOC per million lb resin (0.0706 lbs VOC per Ton Resin)

Polyethylene copolymer processing source Barlow, Conlos, Holdren, Garrison, Harris and Janke-JAWMA-June 1996

\*Emission Factor used is from M163-38767-00106 for Berry Global, Inc., issued November 9, 2017

\*\*This line was originally meant to run PVC but is being changed to run TPV

**Appendix A: Emissions Calculations  
Plastic Pellet Handling (V-1)**

**Company Name: Press-Seal Corporation**  
**Address: 2424 West State Blvd, Fort Wayne, IN 46808**  
**Permit Number: F003-32125-00360**  
**Significant Permit Revision No.: 003-43107-00360**  
**Reviewer: Olajumoke Kayode**

|   | Max Process Rate (lbs/hr) | Max Em Factor (g/KG) | Max Em Factor (lb/ton) | PTE (Lbs/hr) | PTE (Tons/Year) | Uncontrolled Emissions | Dust Control Efficiency | Controlled Emissions |
|---|---------------------------|----------------------|------------------------|--------------|-----------------|------------------------|-------------------------|----------------------|
| Storage & Handling to EU-10                   | 750                       | 0.4 g PM/Kg          | 0.8                    | 0.3          | 1.314           | 1.314                  | 99                      | 0.001314             |
| Intermediate Storage & Handling (Vacuum Line) | 750                       | 0.4 g PM/Kg          | 0.8                    | 0.3          | 1.314           | 1.314                  | 99                      | 0.001314             |
|   |                           |                      |                        |              | <b>TOTALS</b>   | <b>2.628</b>           |                         | <b>0.002628</b>      |

Emission Factors from AP-42 Table 6.6.2-2

Methodology:

$PTE \text{ (tons/year)} = \text{Max Process Rate (lbs/hr)} / 2000 \text{ lbs} * \text{Max Em Factor (lb/ton)} * 8760 \text{ hrs} / 2000 \text{ lbs}$

**Appendix A: Emissions Calculations  
Rubber Extrusion (EU-2 and EU-3)**

**Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit Number: F003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode**

**Unlimited Emissions**

| Process  | Unlimited Throughput (lbs/hr) | PM EF (lb/lb Rubber) | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Tetrachloro-ethane EF (lb/lb Rubber) | Unlimited PM Emissions (ton/yr) | Unlimited VOC Emissions (ton/yr) | Unlimited Total HAPs Emissions (ton/yr) | Unlimited Tetrachloro-ethane Emissions (ton/yr) |
|--|-------------------------------|----------------------|-----------------------|------------------------------|--------------------------------------|---------------------------------|----------------------------------|---|---|
| <b>EU-2 Rubber Extrusion Line 0 (NO3/NO2 Salt Bath) NEW LINE</b> | 900                           | 4.85E-08             | 2.97E-05              | 7.14E-06                     | 2.20E-06                             | 0.0002                          | 0.12                             | 0.03                                    | 0.01  |
| EU-2 Rubber Extrusion Line 1 (NO3/NO2 Salt Bath)                 | 900                           | 4.85E-08             | 2.97E-05              | 7.14E-06                     | 2.20E-06                             | 0.0002                          | 0.12                             | 0.03                                    | 0.01  |
| EU-2 Rubber Extrusion Line 3 (MW Cure)                           | 900                           | 4.85E-08             | 2.97E-05              | 7.14E-06                     | 2.20E-06                             | 0.0002                          | 0.12                             | 0.03                                    | 0.01  |
| EU-2 Rubber Extrusion Line 4 (MW Cure)                           | 900                           | 4.85E-08             | 2.97E-05              | 7.14E-06                     | 2.20E-06                             | 0.0002                          | 0.12                             | 0.03                                    | 0.01  |
| <b>Total</b>   |                               |                      |                       |                              |                                      | <b>0.0008</b>                   | <b>0.47</b>                      | <b>0.11</b>                             | <b>0.03</b>                                     |

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

Limited Emissions (ton/yr) = Limited Throughput (lb/yr) x EF (lb/lb Rubber) x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Rubber Curing (GO-1)**

**Company Name: Press-Seal Corporation**

**Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

**Unlimited Emissions**

| Process               | Unlimited Throughput (lbs/hr)* | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Tetrachloroethane EF (lb/lb Rubber) | Unlimited VOC Emissions (ton/yr) | Unlimited Total HAPs Emissions (ton/yr) | Unlimited Tetrachloroethane Emissions (ton/yr) |
|-----------------------|--------------------------------|-----------------------|------------------------------|-------------------------------------|----------------------------------|---|--|
| Hot Air Curing (GO-1) | 1800                           | 1.36E-03              | 3.28E-04                     | 1.01E-04                            | 10.72                            | 2.59                                    | 0.80   |
| <b>Total</b>          |                                |                       |                              |                                     | <b>10.72</b>                     | <b>2.59</b>                             | <b>0.80</b>                                    |

**Limited Emissions**

| Process               | Limited Throughput (lbs/yr) | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Tetrachloro-ethane EF (lb/lb Rubber) | Limited VOC Emissions (ton/yr) | Limited Total HAPs Emissions (ton/yr) | Limited Tetrachloro-ethane Emissions (ton/yr) |
|-----------------------|-----------------------------|-----------------------|------------------------------|--------------------------------------|--------------------------------|---------------------------------------|---|
| Hot Air Curing (GO-1) | 15,000,000                  | 1.36E-03              | 3.28E-04                     | 1.01E-04                             | 10.20                          | 2.46                                  | 0.76  |
| <b>Total</b>          |                             |                       |                              |                                      | <b>10.20</b>                   | <b>2.46</b>                           | <b>0.76</b>                                   |

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

\*The Unlimited throughput (lbs/hr) of the hot air curing oven is from the microwave rubber curing lines on lines 3&4 only, which totals to 1800 lbs/hr.

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

Limited Emissions (ton/yr) = Limited Throughput (lb/yr) x EF (lb/lb Rubber) x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
Rubber Splicing/Vulcanizing (EU-7)**

**Company Name: Press-Seal Corporation**

**Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

**Unlimited Emissions**

| Process (EU-7)         | Unlimited Throughput (lbs/hr) | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Carbon Disulfide EF (lb/lb Rubber) | Unlimited VOC Emissions (ton/yr) | Unlimited Total HAPs Emissions (ton/yr) | Unlimited Carbon Disulfide Emissions (ton/yr) |
|------------------------|-------------------------------|-----------------------|------------------------------|------------------------------------|----------------------------------|---|---|
| Hydraulic platen press | 660                           | 9.19E-04              | 7.23E-04                     | 5.35E-04                           | 2.66                             | 2.09                                    | 1.55  |
| Pneumatic platen press | 58                            | 9.19E-04              | 7.23E-04                     | 5.35E-04                           | 0.23                             | 0.18                                    | 0.14  |
| Manual platen press    | 276                           | 9.19E-04              | 7.23E-04                     | 5.35E-04                           | 1.11                             | 0.87                                    | 0.65  |
| <b>Total</b>           | 994                           |                       |                              |                                    | <b>4.00</b>                      | <b>3.15</b>                             | <b>2.33</b>                                   |

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput = The summation of the unlimited throughput of the hydraulic platen press, pneumatic platen press and manual platen press

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations**  
**VOC and HAP**  
**From Ink Printing Operations (EU-8) and Insignificant Activities**

**Company Name: Press-Seal Corporation**  
**Address: 2424 West State Blvd, Fort Wayne, IN 46808**  
**Permit Number: F003-32125-00360**  
**Significant Permit Revision No.: 003-43107-00360**  
**Reviewer: Olajumoke Kayode**

| Material                               | Density (lbs/gal) | Maximum Usage (gal/hr) | VOC Content (%) | Methanol Content (%) | Glycol Ether Content (%) | Potential VOC Emissions (ton/yr) | Potential Methanol Emissions (ton/yr) | Potential Glycol Ether Emissions (ton/yr) | Total HAPs Emissions (ton/yr) |
|--|-------------------|------------------------|-----------------|----------------------|--------------------------|----------------------------------|---------------------------------------|---|-------------------------------|
| Ink 18-5600                            | 7.506             | 0.0961                 | 78.00%          | 35.00%               | 7.00%                    | 2.46                             | 1.11                                  | 0.22                                      | 1.33                          |
| Makeup Solution 18-2505                | 6.672             | 0.0045                 | 99.00%          | 47.00%               | 3.00%                    | 0.13                             | 0.06                                  | 0.004                                     | 0.07                          |
| <b>Ink Printing Total:</b>             |                   |                        |                 |                      |                          | <b>2.59</b>                      | <b>1.17</b>                           | <b>0.23</b>                               | <b>1.39</b>                   |
| FlyWheel Cutting Lubricant - IPA Usage | 6.5886            | 0.145                  | 99.00%          | 0.00%                | 0.00%                    | 4.14                             | 0.00                                  | 0.00                                      | 0.00                          |

**Methodology**

Potential Emissions (ton/yr) = Density (lbs/gal) x Maximum Usage (gal/hr) x VOC/HAP Content (%) x 8,760 (hrs/yr) x 1/2,000 (ton/lbs)

**Appendix A: Emissions Calculations  
Rubber Manufacturing (EU-9)**

**Company Name: Press-Seal Corporation**

**Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

**Unlimited VOC Emissions**

| Process                     | Unlimited Throughput (lbs/hr) | PM EF (lb/lb Rubber) | VOC EF (lb/lb Rubber) | Total HAPs EF (lb/lb Rubber) | Tetrachloroethane EF (lb/lb Rubber) | Unlimited PM Emissions (ton/yr) | Unlimited VOC Emissions (ton/yr) | Unlimited Total HAPs Emissions (ton/yr) | Unlimited Tetrachloroethane Emissions (ton/yr) |
|-----------------------------|-------------------------------|----------------------|-----------------------|------------------------------|-------------------------------------|---------------------------------|----------------------------------|---|--|
| Rubber Manufacturing (EU-9) | 2,057                         | 4.02E-04             | 3.91E-05              | 1.33E-05                     | 4.10E-06                            | 3.62                            | 0.35                             | 0.12                                    | 0.04   |
| <b>Total</b>                |                               |                      |                       |                              |                                     | <b>3.62</b>                     | <b>0.35</b>                      | <b>0.12</b>                             | <b>0.04</b>                                    |

**batches/hour**            11  
**lbs input/batch**        187

**Methodology**

Emission Factors are from AP-42, Section 4.12, Manufacture of Rubber Products, Table 4.12-4 for Rubber Compound #2.

Unlimited throughput (lbs/hr) = lbs input/batch X batches/hour

Unlimited Emissions (ton/yr) = Unlimited Throughput (lb/hr) x EF (lb/lb Rubber) x 8,760 hr/yr x 1/2,000 ton/lb.

**Appendix A: Emissions Calculations  
VOC and HAP  
From Adhesives Mixing (EU-5)**

**Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit Number: F003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode**

**MAXIMUM POTENTIAL VOC EMISSIONS ASSOCIATED WITH SURFACE COATING - 8,760 HOURS PER YEAR - ADHESIVE**

| Material<br><br>(EU-5)    | Material Usage<br>(Lb/Hr) | Weight%<br>Volatile | Potential to<br>Emit<br>VOC<br>(lbs/hr) | Potential to<br>Emit<br>VOC<br>(lbs/day) | Potential to<br>Emit<br>VOC<br>(tons/yr) |
|---------------------------|---------------------------|---------------------|---|--|--|
| ADS Polyisoprene Adhesive | 3.0                       | 85.0%               | 2.55                                    | 61.2                                     | 11.17                                    |
| Neoprene Adhesive         | 3.0                       | 87.0%               | 2.61                                    | 62.6                                     | 11.43                                    |
| EPDM Adhesive             | 3.0                       | 81.8%               | 2.45                                    | 58.9                                     | 10.75                                    |
| <b>Rubber Solvent</b>     | <b>3.0</b>                | <b>100%</b>         | <b>3.00</b>                             | <b>72.0</b>                              | <b>13.14</b>                             |
| Sponge Adhesive           | 3.0                       | 79.0%               | 2.37                                    | 56.9                                     | 10.38                                    |
| Nitrile Adhesive          | 3.0                       | 20.0%               | 0.60                                    | 14.4                                     | 2.63                                     |
| <b>Worst-Case PTE:</b>    |                           |                     | <b>3.0</b>                              | <b>72</b>                                | <b>13.14</b>                             |

\*There are no particulates from this operation. The transfer efficiency is 100%. All adhesives are applied manually. PTE is based on worst-case coating. Due to the table size, only one adhesive may be applied at a time.

**HAZARDOUS AIR POLLUTANT EMISSIONS - 8,760 HOURS PER YEAR**

| MATERIAL<br><br>(EU-5)    | Material Usage<br>(Lb/Hr) | Weight<br>Percent (%)<br>Toluene | PTE HAP<br>(lb/hr)<br>Toluene | Weight<br>Percent (%)<br>Hexane | PTE HAP<br>(lb/hr)<br>Hexane | Weight<br>Percent (%)<br>Xylene | PTE HAP<br>(lb/hr)<br>Xylene | PTE HAP<br>(ton/yr)<br>Total HAP |
|---------------------------|---------------------------|----------------------------------|-------------------------------|---------------------------------|------------------------------|---------------------------------|------------------------------|----------------------------------|
| ADS Polyisoprene Adhesive | 3.0                       | 0.00%                            | 0.00                          | 0.00%                           | 0.00                         | 0.00%                           | 0.00                         | 0.00                             |
| Neoprene Adhesive         | 3.0                       | 79.5%                            | 2.39                          | 0.00%                           | 0.00                         | 0.00%                           | 0.00                         | 10.45                            |
| <b>EPDM Adhesive</b>      | <b>3.0</b>                | <b>81.8%</b>                     | <b>2.45</b>                   | <b>0.00%</b>                    | <b>0.00</b>                  | <b>0.00%</b>                    | <b>0.00</b>                  | <b>10.75</b>                     |
| Rubber Solvent            | 3.0                       | 40.0%                            | 1.20                          | 0.00%                           | 0.00                         | 0.00%                           | 0.00                         | 5.26                             |
| Sponge Adhesive           | 3.0                       | 16.0%                            | 0.48                          | 18.0%                           | 0.54                         | 0.00%                           | 0.00                         | 4.47                             |
| Nitrile Adhesive          | 3.0                       | 0.00%                            | 0.00                          | 0.00%                           | 0.00                         | 20.0%                           | 0.60                         | 2.63                             |

**METHODOLOGY**

Potential VOC Pounds per Hour = Maximum Hourly Usage (lb/hr) \* Weight % VOC

Potential VOC Pounds per Day = Maximum Hourly Usage (lb/hr) \* Weight % VOC \* (24 hr/day)

Potential VOC Tons per Year = Maximum Hourly Usage (lb/hr) \* Weight % VOC \* (8760 hr/yr) \* (1 ton/2000 lbs)

Potential HAP Pounds per Hours = Weight Percent HAP (%) x Maximum Hourly Usage (lb/hr)

**Appendix A: Emissions Calculations  
VOC and PM/PM10 Emissions  
From Surface Coating Operations (EU-6)**

**Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit Number: F003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode**

| Material                                       | Density (lb/gal) | Weight % Volatile (H <sub>2</sub> O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Material Usage* (lb/hr) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | PTE VOC (lbs/hour) | PTE VOC (lbs/day) | PTE VOC (tons/year) | PTE PM/PM10 Before Control (tons/year) | Transfer Efficiency** | ***Control Efficiency | PTE PM/PM10 After Control (tons/year) |
|--|------------------|---|----------------|-------------------|----------------|---------------------------------|-------------------------|---|----------------------------------|--------------------|-------------------|---------------------|--|-----------------------|-----------------------|---------------------------------------|
| Waterbased Industrial Black Enamel             | 8.86             | 18.17%  | 0.0%           | 18.17%            | 0.00%          | 30.00%                          | 2.00                    | 1.61  | 1.61                             | 0.36               | 8.72              | 1.59                | 3.58                                   | 50.00%                | 95.0%                 | 0.18                                  |
| Pro Industrial Acrylic Primer - Gray           | 10.23            | 7.82%   | 0.0%           | 7.82%             | 0.00%          | 37.00%                          | 2.00                    | 0.80  | 0.80                             | 0.16               | 3.75              | 0.69                | 4.04                                   | 50.00%                | 95.0%                 | 0.20                                  |
| Pro Industrial 0 VOC Acrylic - Yellow          | 9.17             | 0.11%   | 0.0%           | 0.11%             | 0.00%          | 37.00%                          | 2.00                    | 0.01  | 0.01                             | 0.002              | 0.05              | 0.01                | 4.38                                   | 50.00%                | 95.0%                 | 0.22                                  |
| Pro Industrial 0 VOC Acrylic - Ultra Deep Base | 8.56             | 0.00%   | 0.00%          | 0.00%             | 0.00%          | 33.00%                          | 2.00                    | 0.00  | 0.00                             | 0.00               | 0.00              | 0.00                | 4.38                                   | 50.00%                | 95.0%                 | 0.22                                  |
| <b>Worst Case Coating</b>                      |                  |   |                |                   |                |                                 |                         |   |                                  | <b>0.36</b>        | <b>8.72</b>       | <b>1.59</b>         | <b>4.38</b>                            |                       |                       | <b>0.22</b>                           |

\*Material usage is based on the maximum capacity of 2 cans/hr each with a weight of 1 lb.

There are no HAPs associated with these coatings.

\*\* IDEM has conservatively assumed the aerosol applied coatings will have a transfer efficiency of 50%

\*\*\* The source has claimed the cartidge filters will have a control efficiency of 99.5%. However, IDEM has conservatively assumed a control efficiency of 95%

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

PTE VOC (pounds/hour) = Maximum Usage (lb/hr) \* Weight % Organics

PTE VOC (pounds/day) =Maximum Usage (lb/hr) \* Weight % Organics \* (24 hr/day)

PTE VOC (tons/year) = Maximum Usage (lb/hr) \* Weight % Organics \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE PM/PM10 (tons/year) = Maximum Usage (lb/hr) \* (Weight % Non-Volatiles) \* (1-Transfer efficiency) \*8760 hours/year \*1ton/2000 lbs

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

**Company Name: Press-Seal Corporation**  
**Address: 2424 West State Blvd, Fort Wayne, IN 46808**  
**Permit Number: F003-32125-00360**  
**Significant Permit Revision No.: 003-43107-00360**  
**Reviewer: Olajumoke Kayode**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

10.6

93.3

|                               | Pollutant |       |               |      |                    |      |      |
|-------------------------------|-----------|-------|---------------|------|--------------------|------|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2  | NOx                | VOC  | CO   |
| Emission Factor in lb/MMCF    | 1.9       | 7.6   | 7.6           | 0.6  | 100<br>**see below | 5.5  | 84   |
| Potential Emission in tons/yr | 0.09      | 0.35  | 0.35          | 0.03 | 4.66               | 0.26 | 3.92 |

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

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

|                               | HAPs - Organics |                 |              |           |           | Subtotal for<br>Organics |
|-------------------------------|-----------------|-----------------|--------------|-----------|-----------|--------------------------|
|                               | Benzene         | Dichlorobenzene | Formaldehyde | Hexane    | Toluene   |                          |
| Emission Factor in lb/MMcf    | 2.1E-03         | 1.2E-03         | 7.5E-02      | 1.8E+00   | 3.4E-03   | 8.777E-02                |
| Potential Emission in tons/yr | 9.795E-05       | 5.597E-05       | 3.498E-03    | 8.396E-02 | 1.586E-04 | 8.777E-02                |

|                               | HAPs - Metals |           |           |           |           | Subtotal for<br>Metals | Worst HAP<br>8.396E-02<br>Hexane | Total HAP<br>8.802E-02 |
|-------------------------------|---------------|-----------|-----------|-----------|-----------|------------------------|----------------------------------|------------------------|
|                               | Lead          | Cadmium   | Chromium  | Manganese | Nickel    |                        |                                  |                        |
| Emission Factor in lb/MMcf    | 5.0E-04       | 1.1E-03   | 1.4E-03   | 3.8E-04   | 2.1E-03   | 2.556E-04              |                                  |                        |
| Potential Emission in tons/yr | 2.332E-05     | 5.131E-05 | 6.530E-05 | 1.772E-05 | 9.795E-05 | 2.556E-04              |                                  |                        |

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

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

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

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

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

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

**Appendix A: Emissions Calculations  
List of Combustion Units**

**Company Name: Press-Seal Corporation**

**Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

**Existing Equipment (MMBtu/hr)**

| Name         | ID               | Total Heat Input Capacity |              |
|--------------|------------------|---------------------------|--------------|
| Grieve Oven  | G-01             | 0.4                       |              |
| Space Heater | SH-1             | 0.175                     |              |
| Space Heater | SH-2             | 0.175                     |              |
| Space Heater | SH-3             | 0.175                     |              |
| Space Heater | SH-4             | 0.175                     |              |
| Space Heater | SH-5             | 0.175                     |              |
| Space Heater | SH-6             | 0.175                     |              |
| Air Make-up  | King Air Make-up | 0.6                       |              |
| Ice Heaters  | IH-1 and IH-2    | 0.1                       | Q            |
|              | <b>Subtotal</b>  | <b>2.15</b>               | <b>0.289</b> |

**Boilers (MMBtu/hr)**

| Name                    | Year of Construction | Heat Input Capacity |
|-------------------------|----------------------|---------------------|
| Boilers B-1 through B-3 | 2004                 | <b>0.289</b>        |

**Unpermitted Equipment added 2016 (MMBtu/hr)**

| Name         | ID              | Total Heat Input Capacity |
|--------------|-----------------|---------------------------|
| Space Heater | SH-7            | 0.175                     |
| Space Heater | SH-8            | 0.175                     |
| Space Heater | SH-9            | 0.175                     |
| Space Heater | SH-10           | 0.175                     |
| Space Heater | SH-11           | 0.10                      |
| Space Heater | SH-12           | 0.10                      |
| Space Heater | SH-13           | 0.10                      |
| Space Heater | SH-14           | 0.105                     |
| Space Heater | SH-15           | 0.105                     |
|              | <b>Subtotal</b> | <b>1.21</b>               |

**Boilers (MMBtu/hr)**

| Name        | Year of Construction | Heat Input Capacity | Q     |
|-------------|----------------------|---------------------|-------|
| Boilers B-4 | 2016                 | <b>7.00</b>         | 7.289 |

**Appendix A: Emissions Calculations  
Plastic Injection**

**Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808**

**Permit Number: F003-32125-00360**

**Significant Permit Revision No.: 003-43107-00360**

**Reviewer: Olajumoke Kayode**

| Unit ID                     | Resin Type           | Max Throughput Rate (lbs resin/hr) | PM  |                    |                 | VOC                                       |                    |                 | CO <sup>(3)</sup>                         |                    |                 | NO <sub>x</sub> <sup>(3)</sup>            |                    |                 |
|-----------------------------|----------------------|------------------------------------|---|--------------------|-----------------|---|--------------------|-----------------|---|--------------------|-----------------|---|--------------------|-----------------|
|                             |                      |                                    | Emission Factor (lbs/10 <sup>6</sup> lbs) | Emissions (lbs/hr) | PTE (tons/year) | Emission Factor (lbs/10 <sup>6</sup> lbs) | Emissions (lbs/hr) | PTE (tons/year) | Emission Factor (lbs/10 <sup>6</sup> lbs) | Emissions (lbs/hr) | PTE (tons/year) | Emission Factor (lbs/10 <sup>6</sup> lbs) | Emissions (lbs/hr) | PTE (tons/year) |
| PI-01                       | HDPE <sup>(1)</sup>  | 50                                 | 26.63                                     | 0.0013             | 0.0058          | 38.5                                      | 0.0019             | 0.0084          | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | Nylon <sup>(3)</sup> | 50                                 | 104                                       | 0.0052             | 0.023           | 137                                       | 0.0069             | 0.030           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | PP <sup>(2)</sup>    | 50                                 | 34.5                                      | 0.0017             | 0.0076          | 80.3                                      | 0.0040             | 0.018           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
| <b>Worst Case for PI-01</b> |                      |                                    |   | <b>0.0052</b>      | <b>0.023</b>    |   | <b>0.0069</b>      | <b>0.030</b>    |   | <b>0.00005</b>     | <b>0.00022</b>  |   | <b>0.000002</b>    | <b>0.000009</b> |
| PI-02                       | HDPE <sup>(1)</sup>  | 50                                 | 26.63                                     | 0.0013             | 0.0058          | 38.5                                      | 0.0019             | 0.0084          | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | Nylon <sup>(3)</sup> | 50                                 | 104                                       | 0.0052             | 0.023           | 137                                       | 0.0069             | 0.030           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | PP <sup>(2)</sup>    | 50                                 | 34.5                                      | 0.0017             | 0.0076          | 80.3                                      | 0.0040             | 0.018           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
| <b>Worst Case for PI-02</b> |                      |                                    |   | <b>0.0052</b>      | <b>0.023</b>    |   | <b>0.0069</b>      | <b>0.030</b>    |   | <b>0.00005</b>     | <b>0.00022</b>  |   | <b>0.000002</b>    | <b>0.000009</b> |
| PI-03                       | HDPE <sup>(1)</sup>  | 50                                 | 26.63                                     | 0.0013             | 0.0058          | 38.5                                      | 0.0019             | 0.0084          | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | Nylon <sup>(3)</sup> | 50                                 | 104                                       | 0.0052             | 0.023           | 137                                       | 0.0069             | 0.030           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | PP <sup>(2)</sup>    | 50                                 | 34.5                                      | 0.0017             | 0.0076          | 80.3                                      | 0.0040             | 0.018           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
| <b>Worst Case for PI-03</b> |                      |                                    |   | <b>0.0052</b>      | <b>0.023</b>    |   | <b>0.0069</b>      | <b>0.030</b>    |   | <b>0.00005</b>     | <b>0.00022</b>  |   | <b>0.000002</b>    | <b>0.000009</b> |
| PI-04                       | HDPE <sup>(1)</sup>  | 50                                 | 26.63                                     | 0.0013             | 0.0058          | 38.5                                      | 0.0019             | 0.0084          | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | Nylon <sup>(3)</sup> | 50                                 | 104                                       | 0.0052             | 0.023           | 137                                       | 0.0069             | 0.030           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
|                             | PP <sup>(2)</sup>    | 50                                 | 34.5                                      | 0.0017             | 0.0076          | 80.3                                      | 0.0040             | 0.018           | 1   | 0.00005            | 0.00022         | 0.04                                      | 0.000002           | 0.000009        |
| <b>Worst Case for PI-04</b> |                      |                                    |   | <b>0.0052</b>      | <b>0.023</b>    |   | <b>0.0069</b>      | <b>0.030</b>    |   | <b>0.00005</b>     | <b>0.00022</b>  |   | <b>0.000002</b>    | <b>0.000009</b> |
| <b>Total of Worst Cases</b> |                      |                                    |   | <b>0.021</b>       | <b>0.091</b>    |   | <b>0.027</b>       | <b>0.12</b>     |   | <b>0.0002</b>      | <b>0.00088</b>  |   | <b>0.000008</b>    | <b>0.000035</b> |

**Methodology**

Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) / 1,000,000

Emissions (tons/yr) = Emissions (lbs/hr) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**Notes**

PP = Polypropylene

HDPE = High Density Polyethylene

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 3.

<sup>(1)</sup>The HDPE emission factors for PM and VOC comes from the technical paper, Volume 46, published in June 1996, by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polyethylene Processing". A melt temperature of 430 degrees F was used from Table 8.

<sup>(2)</sup>The emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, by the Journal of Air and Waste

Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used from Table 5.

<sup>(3)</sup>Emission factors for PM, VOC CO and NO<sub>x</sub> from polyamide processing (Nylon is a polyamide) were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3. The CO and NO<sub>x</sub> emission factors were used for all resin types.

**Appendix A: Emissions Calculations  
Plastic Injection HAPs**

**Company Name: Press-Seal Corporation  
Address: 2424 West State Blvd, Fort Wayne, IN 46808  
Permit Number: F003-32125-00360  
Significant Permit Revision No.: 003-43107-00360  
Reviewer: Olajumoke Kayode**

**HAP Emission Factors from  
Processing Polypropylene**

| HAP Constituent | <sup>(1)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs) |
|-----------------|--|
| Acetaldehyde    | 0.20   |
| Acrolein        | 0.01   |
| Formaldehyde    | 0.18   |
| Propionaldehyde | 0.95   |
| Acrylic acid    | 0.08   |

**HAP Emission Factors from  
Processing HDPE**

| HAP Constituent | <sup>(2)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs) |
|-----------------|--|
| Acetaldehyde    | 0.05   |
| Acrolein        | 0.02   |
| Formaldehyde    | 0.06   |
| Propionaldehyde | 0.02   |
| Acrylic acid    | 0.02   |

**HAP Emission Factors from  
Processing Nylon**

| HAP Constituent | <sup>(3)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs) |
|-----------------|--|
| Styrene         | 0.01   |

| Unit ID                     | Resin Type          | Max Throughput Rate (lbs resin/hr) | Acetaldehyde Emissions (tons/yr) | Acrolein Emissions (tons/yr) | Formaldehyde Emissions (tons/yr) | Propionaldehyde Emissions (tons/yr) | Acrylic acid Emissions (tons/yr) | Styrene Emissions (tons/yr) |                   |
|-----------------------------|---------------------|------------------------------------|----------------------------------|------------------------------|----------------------------------|-------------------------------------|----------------------------------|-----------------------------|-------------------|
| PI-01                       | HDPE <sup>(2)</sup> | 50                                 | 0.000011                         | 0.0000044                    | 0.000013                         | 0.0000044                           | 0.0000044                        | 0                           |                   |
|                             | PA <sup>(3)</sup>   | 50                                 | 0                                | 0                            | 0                                | 0                                   | 0                                | 0.0000022                   |                   |
|                             | PP <sup>(4)</sup>   | 50                                 | 0.000044                         | 0.0000022                    | 0.000039                         | 0.00021                             | 0.0000044                        | 0                           |                   |
| <b>Worst Case for PI-01</b> |                     |                                    | <b>0.000044</b>                  | <b>0.0000044</b>             | <b>0.000039</b>                  | <b>0.00021</b>                      | <b>0.0000044</b>                 | <b>0.0000022</b>            |                   |
| PI-02                       | HDPE <sup>(2)</sup> | 50                                 | 0.000011                         | 0.0000044                    | 0.000013                         | 0.0000044                           | 0.0000044                        | 0                           |                   |
|                             | PA <sup>(3)</sup>   | 50                                 | 0                                | 0                            | 0                                | 0                                   | 0                                | 0.0000022                   |                   |
|                             | PP <sup>(4)</sup>   | 50                                 | 0.000044                         | 0.0000022                    | 0.000039                         | 0.00021                             | 0.0000044                        | 0                           |                   |
| <b>Worst Case for PI-02</b> |                     |                                    | <b>0.000044</b>                  | <b>0.0000044</b>             | <b>0.000039</b>                  | <b>0.00021</b>                      | <b>0.0000044</b>                 | <b>0.0000022</b>            |                   |
| PI-03                       | HDPE <sup>(2)</sup> | 50                                 | 0.000011                         | 0.0000044                    | 0.000013                         | 0.0000044                           | 0.0000044                        | 0                           |                   |
|                             | PA <sup>(3)</sup>   | 50                                 | 0                                | 0                            | 0                                | 0                                   | 0                                | 0.0000022                   |                   |
|                             | PP <sup>(4)</sup>   | 50                                 | 0.000044                         | 0.0000022                    | 0.000039                         | 0.00021                             | 0.0000044                        | 0                           |                   |
| <b>Worst Case for PI-03</b> |                     |                                    | <b>0.000044</b>                  | <b>0.0000044</b>             | <b>0.000039</b>                  | <b>0.00021</b>                      | <b>0.0000044</b>                 | <b>0.0000022</b>            |                   |
| PI-04                       | HDPE <sup>(2)</sup> | 50                                 | 0.000011                         | 0.0000044                    | 0.000013                         | 0.0000044                           | 0.0000044                        | 0                           |                   |
|                             | PA <sup>(3)</sup>   | 50                                 | 0                                | 0                            | 0                                | 0                                   | 0                                | 0.0000022                   |                   |
|                             | PP <sup>(4)</sup>   | 50                                 | 0.000044                         | 0.0000022                    | 0.000039                         | 0.00021                             | 0.0000044                        | 0                           |                   |
| <b>Worst Case for PI-04</b> |                     |                                    | <b>0.000044</b>                  | <b>0.0000044</b>             | <b>0.000039</b>                  | <b>0.00021</b>                      | <b>0.0000044</b>                 | <b>0.0000022</b>            |                   |
| <b>Total of Worst Cases</b> |                     |                                    | <b>0.00018</b>                   | <b>0.000018</b>              | <b>0.00016</b>                   | <b>0.00083</b>                      | <b>0.000018</b>                  | <b>0.0000088</b>            | <b>0.00120888</b> |
|                             |                     |                                    |                                  |                              |                                  |                                     |                                  |                             | <b>Net Total</b>  |

**Methodology**

HAPs Emissions (tons/yr) = (Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) /1000000) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**Notes**

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 5. This methodology and the emission factors were used in Registration No. 005-28577-00102.  
<sup>(1)</sup> Emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used from Table 5. The emission factors for PP were used for the PE resins.

<sup>(2)</sup> Emission factors for HAPs from HDPE Resins were taken from the technical paper, "Development of Emission Factors for Polyethylene Processing" from Volume 46, published in June 1996 of the Journal of Air and Waste Management Association.

<sup>(3)</sup> Emission factors for HAPs from polyamide processing (Nylon is a polyamide) were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

Mr. Brad Carpenter  
Press-Seal Corporation  
2424 West State Boulevard  
Fort Wayne, Indiana 46808

September 29, 2020

Re: Public Notice  
Press-seal Corporation  
Permit Level: FESOP Significant Permit Revision  
(Minor PSD)  
Permit Number: 003-43107-00360

Dear Mr. Carpenter:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

**IDEM's online searchable database:** <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43107

and

**IDEM's Virtual File Cabinet (VFC):** <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/idem/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Allen County Public Library (Main Branch), 900 Library Plaza in Fort Wayne, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ms. Olajumoke Kayode, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5373 or dial (317) 234-5373.

Sincerely,  
*John F. Jackson*

John F. Jackson  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter access via website 8/10/2020



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

September 29, 2020

To: Allen County Public Library (Main Branch)

From: Jenny Acker, Branch Chief  
Permits Branch  
Office of Air Quality

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

**Applicant Name: Press-Seal Corporation**  
**Permit Number: 003-43107-00360**

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library updated 4/2019



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

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Commissioner

## Notice of Public Comment

September 29, 2020  
**Press-Seal Corporation**  
**003-43107-00360**

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at [JBRUSH@IDEM.IN.GOV](mailto:JBRUSH@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover Letter 2/28/2020



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### AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 29, 2020

A 30-day public comment period has been initiated for:

**Permit Number:** 003-43107-00360  
**Applicant Name:** Press-Seal Corporation  
**Location:** Fort Wayne, Allen County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management  
Office of Air Quality, Permits Branch  
100 North Senate Avenue  
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at [chammack@idem.IN.gov](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification 1/9/2017

# Mail Code 61-53

|                            |   |   |  |
|----------------------------|---|---|--|
| IDEM Staff                 | JJACKSON<br>Press-Seal Corporation 003-43107-00360 (DRAFT)  | September 29, 2020                                      | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> |  |

| Line | Article Number | Name, Address, Street and Post Office Address   | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1    |                | Brad Carpenter Press-Seal Corporation 2424 W State Blvd Fort Wayne IN 46808 (Source CAATS)                    |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)                        |         |                 |                            |               |                 |          |          |          |                |         |
| 3    |                | Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)                      |         |                 |                            |               |                 |          |          |          |                |         |
| 4    |                | Allen County Public Library - Main Branch 900 Library Plaza, PO Box 2270 Fort Wayne IN 46802 (Library)        |         |                 |                            |               |                 |          |          |          |                |         |
| 5    |                | Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)     |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party) |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                | Roanoke Town Council P.O. Box 328 Roanoke IN 46783 (Local Official)   |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                | Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)              |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                | Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)    |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                | Mr. Jason Morrison SevenGen 604 W Wayne St Fort Wayne IN 46802 (Consultant)                                   |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                | Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)                             |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                |   |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                |   |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                |   |         |                 |                            |               |                 |          |          |          |                |         |
| 15   |                |   |         |                 |                            |               |                 |          |          |          |                |         |

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