NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit for BRC Rubber & Plastics, Inc. in Blackford County

Significant Source Modification No.: 009-43813-00002
Significant Permit Modification No.: 009-43940-00002

The Indiana Department of Environmental Management (IDEM) has received an application from BRC Rubber & Plastics, Inc., located at 623 West Monroe Street, Montpelier, Indiana 47359, for a significant modification of its Part 70 Operating Permit issued on February 19, 2019. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow BRC Rubber & Plastics, Inc. to make certain changes at its existing source.

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). 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:

Montpelier Harrison Township Public Library
301 South Main Street
Montpelier, IN 47359

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: https://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/public-notices/) marks the beginning of a 30-day public comment period. If the 30th 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 SSM 009-43813-00002 and SPM 009-43940-00002 in all correspondence.

Comments should be sent to:

Hachem Ismaili Alaoui
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Hachem Ismaili Alaoui or (317) 232-2827
Or dial directly: (317) 232-2827
Fax: (317) 232-6749 attn: Hachem Ismaili Alaoui
E-mail: HIAlaoui@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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

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 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Hachem Ismaili Alaoui of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality
Dear DeLong:

BRC Rubber & Plastics, Inc. was issued Part 70 Operating Permit Renewal No. T009-39987-00002 on February 19, 2019 for a stationary miscellaneous rubber, metal, and plastic parts manufacturing operation located at 623 West Monroe Street, Montpelier, Indiana 47359. An application to modify the source was received on March 1, 2021. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) robotic primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(b) One (1) robotic adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(c) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(d) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(e) One (1) automatic phosphate line, identified as Phosline #3, approved in 2021 for construction, using no control, exhausting indoors, and consisting of the following:
DRAFT

(1) One (1) alkaline soak tank with a maximum capacity of 800 gallons and a soaking rate of 85 gallons per month.

(2) One (1) acid pickle tank with maximum capacity of 800 gallons and a soaking rate of 36 gallons per month.

(3) One (1) phosphate tank with maximum capacity of 800 gallons and a soaking rate of 44 gallons per month.

(4) One (1) sealer tank with maximum capacity of 800 gallons and a soaking rate of 43 gallons per month.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source’s Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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: https://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: https://www.in.gov/idem/airpermit/public-participation/; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/resources/citizens-guide-to-idem/.

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

If you have any questions regarding this matter, please contact Hachem Ismaili Alaoui, 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) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document

cc: File - Blackford County
Blackford County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Significant Source Modification
to a Part 70 Source

OFFICE OF AIR QUALITY

BRC Rubber & Plastics, Inc.
623 West Monroe Street
Montpelier, Indiana 47359

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

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

This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

| Significant Source Modification No.: 009-43813-00002 |
| Master Agency Interest ID: 14889 |

Issued by: Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
TABLE OF CONTENTS

SECTION A  SOURCE SUMMARY ................................................................................................................................. 6
   A.1  General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]
   A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]
   A.3  Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]
   A.4  Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION B  GENERAL CONDITIONS ............................................................................................................................ 13
   B.1  Definitions [326 IAC 2-7-1]
   B.2  Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
   B.3  Term of Conditions [326 IAC 2-1.1-9.5]
   B.4  Enforceability [326 IAC 2-7-7][IC 13-17-12]
   B.5  Severability [326 IAC 2-7-5(5)]
   B.6  Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
   B.7  Duty to Provide Information [326 IAC 2-7-5(6)(E)]
   B.8  Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
   B.9  Annual Compliance Certification [326 IAC 2-7-6(5)]
   B.10  Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]
   B.11  Emergency Provisions [326 IAC 2-7-16]
   B.12  Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
   B.13  Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
   B.14  Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
   B.15  Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
   B.16  Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
   B.17  Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
   B.18  Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
   B.19  Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
   B.20  Source Modification Requirement [326 IAC 2-7-10.5]
   B.21  Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
   B.22  Transfer of Ownership or Operational Control [326 IAC 2-7-11]
   B.23  Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
   B.24  Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS ...................................................................................................... 24
   Emission Limitations and Standards [326 IAC 2-7-5(1)] ....................................................................................... 24
      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  Opacity [326 IAC 5-1]
      C.3  Open Burning [326 IAC 4-1][IC 13-17-9]
      C.4  Incineration [326 IAC 4-2][326 IAC 9-1-2]
      C.5  Fugitive Dust Emissions [326 IAC 6-4]
      C.6  Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
   Testing Requirements [326 IAC 2-7-6(1)] ................................................................................................................. 25
      C.7  Performance Testing [326 IAC 3-6]
   Compliance Requirements [326 IAC 2-1.1-11] ...................................................................................................... 26
      C.8  Compliance Requirements [326 IAC 2-1.1-11]
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]................................. 26
C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]
C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] ........................................ 27
C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]
C.12 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]
C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19] ...................... 30
C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][40 CFR 64][326 IAC 3-8]

Stratospheric Ozone Protection ................................................................................................. 32
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 33

Emission Limitations and Standards [326 IAC 2-7-5(1)] ............................................................ 36
D.1.1 PSD Minor Limits: Volatile Organic Compounds (VOC) [326 IAC 2-2]
D.1.2 Volatile Organic Compound (VOC) Emission Limits [326 IAC 8-1-6]
D.1.3 Particulate Emission Limits [326 IAC 6-3-2]
D.1.4 Particulate Emission Limits [326 IAC 6-3-2]
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements [326 IAC 2-7-5(1)] ................................................... 38
D.1.6 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2][326 IAC 8-1-4]
D.1.7 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] .............................. 40
D.1.8 Surface Coating Particulate Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19] ...................... 40
D.1.9 Record Keeping Requirements
D.1.10 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 42

Emission Limitations and Standards [326 IAC 2-7-5(1)] ............................................................ 42
D.2.1 PSD Minor Limits: PM, PM10, and PM2.5 [326 IAC 2-2]
D.2.2 Particulate Matter Limits [326 IAC 6-3-2]
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements [326 IAC 2-7-5(1)] ................................................... 43
D.2.4 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] .............................. 44
D.2.5 Visible Emissions Notations [40 CFR 64]
D.2.6 Parametric Monitoring [40 CFR 64]
D.2.7 Broken or Failed Bag Detection
D.2.8 Self-Contained Vacuum Inspections [40 CFR 64]
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19] .......... 45
D.2.9 Record Keeping Requirements

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 46
Emission Limitations and Standards [326 IAC 2-7-5(1)] ......................................................... 46
D.3.1 Particulate Matter Limits [326 IAC 6-2-4]
D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 47
Emission Limitations and Standards [326 IAC 2-7-5(1)] ......................................................... 47
D.4.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]
D.4.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19] .......... 48
D.4.4 Record Keeping Requirements

SECTION E.1 NESHAP ........................................................................................................................... 49
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)] ............................................................................................................. 51
E.1.2 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM][326 IAC 20-80]

SECTION E.2 NESHAP ........................................................................................................................... 53
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)] ............................................................................................................. 55
E.2.2 Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPPP][326 IAC 20-81]

SECTION E.3 NSPS ................................................................................................................................ 56
New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)] ...................... 56
E.3.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12][40 CFR Part 60, Subpart Dc]

SECTION E.4 NESHAP ........................................................................................................................... 57
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)] ............................................................................................................. 57
E.4.2 Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [40 CFR Part 63, Subpart DDDDD][326 IAC 20-95]

CERTIFICATION ........................................................................................................................................ 59
EMERGENCY OCCURRENCE REPORT ............................................................................................... 60
Part 70 Quarterly Report ........................................................................................................................... 62
Part 70 Quarterly Report ........................................................................................................................... 63
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ............................................................................................................. 64
Attachment A: National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM)

Attachment B: National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP)

Attachment C: New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc)

SECTION A  SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>623 West Monroe Street, Montpelier, Indiana 47359</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(260) 693-2171</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3069 (Fabricated Rubber Products, Not Elsewhere Classified)</td>
</tr>
<tr>
<td></td>
<td>3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Blackford</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Major Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

1. One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3.

2. One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4.

3. One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5.

4. Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

Under 40 CFR Part 63, Subpart MMMM, PB1, PB2, and PB3 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB1, PB2, and PB3 are considered affected facilities.

(b) Chain-on-edge #1 coating operation, consisting of the following:

(1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.

(2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.

(3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.

(4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

Under 40 CFR Part 63, Subpart MMMM, PB4, PB5, and PB14 are considered affected facilities.

Under 40 CFR Part 63, Subpart PPPP, PB4, PB5, and PB14 are considered affected facilities.

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

Under 40 CFR Part 63, Subpart MMMM, PB6 is considered an affected facility.

Under 40 CFR Part 63, Subpart PPPP, PB6 is considered an affected facility.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.

Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.

Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.
Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) robotic primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) robotic adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.

(k) One (1) coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

1. Three (3) electric pre-heat ovens, exhausting to stack S23.
2. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP1, using a dry filter for particulate control, and exhausting to stack S23.
3. One (1) electric flash oven, exhausting to stack S23.
4. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP2, using a dry filter for particulate control, and exhausting to stack S23.
5. Three (3) electric drying ovens, exhausting to stack S23.

Under 40 CFR Part 63, Subpart MMMM, TSA1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, TSA1 is considered an affected facility.
Blasters:

(l) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.

(m) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.

(n) One (1) steel shot blaster, identified as Blaster 2, installed in January 2004, with a nominal capacity of 477.3 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 12,240 pounds of steel shot per hour, using a self-contained vacuum (CB2) for particulate control, and exhausting indoors.

(o) One (1) grit blaster, identified as Blaster 3, installed in November 2004, with a nominal capacity of 350.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 2,312.7 pounds of aluminum oxide per hour, using a self-contained vacuum (CB3) for particulate control, and exhausting indoors.

(p) One (1) grit blaster, identified as Blaster 4, installed in 2005, with a nominal capacity of 80.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.

(q) One (1) grit blaster, identified as Blaster 5, installed in 2008, with a nominal capacity of 100.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.

(r) One (1) metal casing steel shot blaster, identified as Blaster 6, installed in 2011, with a nominal capacity of 2,143 pounds of parts and steel shot per hour, using a dust collector (CB6) for particulate control, and exhausting indoors.

(s) One (1) grit blasting cabinet, identified as Blaster 7, installed in 2017, equipped with four (4) nozzles on a turntable, with a nominal capacity of 500 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 680 pounds of aluminum oxide per hour, using a dust collector (CB5) for particulate control, and exhausting indoors.

Boilers:

(t) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 MMBtu per hour, and exhausting to stack S-BLR3.

Under 40 CFR Part 63, Subpart DDDDD, BLR3 is considered an affected facility.

(u) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 MMBtu per hour, and exhausting to stack S-BLR4.

Under 40 CFR Part 60, Subpart Dc, BLR4 is considered an affected facility.
Under 40 CFR Part 63, Subpart DDDDD, BLR4 is considered an affected facility.

Miscellaneous:

(v) One (1) flammable liquid storage room, identified as FSTOR, installed prior to 1980, with a nominal capacity of 3,050 gallons, and exhausting to Stack S17.
(w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

Rubber Mixing and Milling Lines:

(x) One (1) primary mixing and milling line, with a nominal capacity of 3,500 pounds of rubber ingredients per hour, and consisting of:

1. One (1) banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, replaced in 2014, exhausting to Stack S16.
2. One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.

(y) One (1) secondary milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:

1. One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.

(z) One (1) mixing and milling line, installed in 2014, with a nominal capacity of 3,800 pounds of rubber ingredients per hour, and consisting of:

1. One (1) banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE.
2. One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

(aa) One (1) small batch mixer, identified as SBMIX, constructed in 2010, with a maximum capacity of 75 pounds of rubber ingredients per hour, using a dust collector for control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

(a) One (1) R&D mixing and milling line, installed in 2014, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, exhausting indoors, and consisting of:

1. One (1) small banbury mixer identified as RDMIX.
2. One (1) 30-inch RPRCSS rubber making mill, identified as RDMILL.

(b) One (1) rubber dip coating operation, identified as RCOAT, with a nominal capacity of 3,500 pounds of rubber per hour and 49,280 pounds of clay coating per year, using no control, and exhausting indoors.

(c) One (1) self-contained sandblaster, identified as SBLAST, with a nominal throughput rate of 12.5 pounds of sand per day, using a built-in dust collector for particulate control, and exhausting indoors.

(d) Three (3) carbon silos, collectively identified as CSILOS, replaced in 2018, with a nominal
throughput of 1,700,000 pounds of carbon per year.

(e) One (1) automatic phosphate line, identified as Phosline #1, installed in January 2003, using no control, exhausting through Stack S11, and consisting of the following:

1. One (1) alkaline soak tank with a nominal capacity of 800 gallons.
2. One (1) acid pickle tank with a nominal capacity of 400 gallons.
3. One (1) phosphate tank with a nominal capacity of 400 gallons.
4. One (1) sealer tank with a nominal capacity of 400 gallons.
5. Four (4) rinse tanks each with a nominal capacity of 400 gallons.

(f) One (1) manual phosphate line, identified as Phosline #2, using no control, exhausting through Stack S12, and consisting of the following:

1. One (1) alkaline soak tank with a nominal capacity of 400 gallons.
2. One (1) alkaline stripper tank with a nominal capacity of 400 gallons.
3. One (1) hydrochloric acid pickle tank with a nominal capacity of 400 gallons.
4. One (1) phosphate tank with a nominal capacity of 400 gallons.
5. One (1) sealer tank with a nominal capacity of 400 gallons.
6. One (1) alumabrite tank with a nominal capacity of 400 gallons.

(g) One (1) automatic phosphate line, identified as Phosline #3, approved in 2021 for construction, using no control, exhausting indoors, and consisting of the following:

1. One (1) alkaline soak tank with a maximum capacity of 800 gallons and a soaking rate of 85 gallons per month.
2. One (1) acid pickle tank with maximum capacity of 800 gallons and a soaking rate of 36 gallons per month.
3. One (1) phosphate tank with maximum capacity of 800 gallons and a soaking rate of 44 gallons per month.
4. One (1) sealer tank with maximum capacity of 800 gallons and a soaking rate of 43 gallons per month.

(h) One (1) chlorination tank, installed in 2012, using no control, and exhausting indoors.

(i) Four (4) electric ovens, installed in June 2004 and 2005, identified as:

1. Three (3) heating ovens, identified as Oven 7, Oven 8 and Oven 9, exhausted to Stacks S13, S14, and S15, respectively.
2. One (1) drying oven, identified as Oven 10, exhausted to Stack S16.
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B GENERAL CONDITIONS

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T009-39987-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:
(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]
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 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
it contains a certification by a "responsible official" as defined by 326 IAC 2-7-
1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses
the status of the source's compliance with the terms and conditions contained in this
permit, including emission limitations, standards, or work practices. 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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered
timely if the date postmarked on the envelope or certified mail receipt, or affixed by the
shipper on the private shipping receipt, is on or before the date it is due. If the document
is submitted by any other means, it shall be considered timely if received by IDEM, OAQ
on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the
basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently
and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may
require to determine the compliance status of the source.
The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]
   (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

   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 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(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.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 2-7-5(3)(C)(ii) and must contain the following:
   
   A description of the emergency;
   
   Any steps taken to mitigate the emissions; and
   
   Corrective actions taken.
The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) 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.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissuance. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T009-39987-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised under 326 IAC 2-7-10.5, or

3. deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-
5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,
subsequent to the completeness determination, the Permittee fails to submit by the
deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any
additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.</td>
</tr>
<tr>
<td>(b)</td>
<td>Any application requesting an amendment or modification of this permit shall be submitted to:</td>
</tr>
<tr>
<td></td>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td></td>
<td>Permit Administration and Support Section, Office of Air Quality</td>
</tr>
<tr>
<td></td>
<td>100 North Senate Avenue</td>
</tr>
<tr>
<td></td>
<td>MC 61-53 IGCN 1003</td>
</tr>
<tr>
<td></td>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
<tr>
<td></td>
<td>Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).</td>
</tr>
<tr>
<td>(c)</td>
<td>The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]</td>
</tr>
</tbody>
</table>

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.</td>
</tr>
<tr>
<td>(b)</td>
<td>Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.</td>
</tr>
</tbody>
</table>

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>(1)</td>
<td>The changes are not modifications under any provision of Title I of the Clean Air Act;</td>
</tr>
<tr>
<td>(2)</td>
<td>Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;</td>
</tr>
<tr>
<td>(3)</td>
<td>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);</td>
</tr>
<tr>
<td>(4)</td>
<td>The Permittee notifies the:</td>
</tr>
</tbody>
</table>
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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
   
   (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

   (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

   (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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.
### SECTION C  SOURCE OPERATION CONDITIONS

#### Entire Source

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

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 **Opacity**  \[326 IAC 5-1\]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 **Open Burning**  \[326 IAC 4-1\][IC 13-17-9]

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

C.4 **Incineration**  \[326 IAC 4-2\][326 IAC 9-1-2]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 **Asbestos Abatement Projects**  \[326 IAC 14-10\][326 IAC 18][40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

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.

The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(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.

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)][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 [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(1) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.

(II)

(a) CAM Response to excursions or exceedances.

1. Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

2. 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, monitoring results, review of operation and maintenance procedures and records,
and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestabishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) CAM recordkeeping requirements.

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-19]

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

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

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

(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 Part 70 permit.

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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][40 CFR 64][326 IAC 3-8]

(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 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary
report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

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

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

#### SECTION D.1

**Emissions Unit Description:**

**Coating Operation:**

(a) Chain-on-edge #2 coating operation, consisting of the following:

1. One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3.

2. One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4.

3. One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5.

4. Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

Under 40 CFR Part 63, Subpart MMMM, PB1, PB2, and PB3 are considered affected facilities. Under 40 CFR Part 63, Subpart PPPP, PB1, PB2, and PB3 are considered affected facilities.

(b) Chain-on-edge #1 coating operation, consisting of the following:

1. One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.

2. One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.

3. One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.

4. Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

Under 40 CFR Part 63, Subpart MMMM, PB4, PB5, and PB14 are considered affected facilities. Under 40 CFR Part 63, Subpart PPPP, PB4, PB5, and PB14 are considered affected facilities.

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993.
equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

Under 40 CFR Part 63, Subpart MMMM, PB6 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB6 is considered an affected facility.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also
exhausting to Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.

(k) One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

(1) Three (3) electric pre-heat ovens, exhausting to stack S23.

(2) One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP1, using a dry filter for particulate control, and exhausting to stack S23;

(3) One (1) electric flash oven, exhausting to stack S23.

(4) One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP2, using a dry filter for particulate control, and exhausting to stack S23.

(5) Three (3) electric drying ovens, exhausting to stack S23.

Under 40 CFR Part 63, Subpart MMMM, TSA1 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, TSA1 is considered an affected facility.

Rubber Mixing and Milling Lines:

(x) One (1) primary mixing and milling line, with a nominal capacity of 3,500 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, replaced in 2014, exhausting to Stack S16.

(2) One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.

(y) One (1) secondary milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.

(z) One (1) mixing and milling line, installed in 2014, with a nominal capacity of 3,800 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE.

(2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

(aa) One (1) small batch mixer, identified as SBMIX, constructed in 2010, with a maximum capacity of 75 pounds of rubber ingredients per hour, using a dust collector for control, and exhausting indoors.

Insignificant Activities:
(a) One (1) R&D mixing and milling line, installed in 2014, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, exhausting indoors, and consisting of:

(1) One (1) small banbury mixer, identified as R&DMIX.

(2) One (1) 30-inch RPRCSS rubber making mill, identified as R&DMILL.

(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 2-7-5(1)]**

**D.1.1 PSD Minor Limits: Volatile Organic Compounds (VOC) [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC input, including coatings, dilution solvents, and cleaning solvents, to the following coating operations and total input of rubber ingredients to the following mixing and milling lines shall be limited such that the VOC emissions shall not exceed 246.00 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month:

**Coating Operation:**

(a) Chain-on-edge #2 coating operation:
   (1) PB1 (Chain-on-edge #2 North, Station 130-1)
   (2) PB2 (Chain-on-edge #2 West, Station 130-2)
   (3) PB3 (Chain-on-edge #2 South, Station 130-3)

(b) Chain-on-edge #1 coating operation:
   (1) PB4 (Chain-on-edge #1 West, Station 126-1)
   (2) PB5 (Chain-on-edge #1 South, Station 126-2)
   (3) PB14 (Chain-on-edge #1 East, Station 126-3)

(c) PB6 (Station 120)

(d) PB10 (Station 119)

(e) PB11 (Station 121)

(f) PB12 (Station 122)

(g) PB13 (Station 123)

(h) PB20 (Station 121)

(i) PB21 (Station 121)

(j) PB22 (Station 116)

(k) DIP1 (Station 129)

(l) TSA1 (Station 125):
   (1) TSA1 - HVLP1
   (2) TSA1 - HVLP2

**Rubber Mixing and Milling Lines:**

(m) Primary mixing and milling line:
   (1) Banbury mixer (PMIX)
   (2) RPRCSS rubber making mill (PMILL)

(n) Secondary milling line:
   (1) RPRCSS rubber making mill (SMILL)

(o) Mixing and milling line:
   (1) Banbury mixer (NEMIX)
   (2) RPRCSS rubber making mill (NEMILL)

(p) Small batch mixer (SBMIX)
Insignificant Activities:

(q) R&D mixing and milling line:
   (1) Banbury mixer (R&DMIX)
   (2) RPRCSS rubber making mill (R&DMILL)

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (250) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Volatile Organic Compound (VOC) Emission Limits [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the following:

The VOC input, including coatings, dilution solvents, and cleaning solvents, to robotic adhesive booth PB21 (Station 121) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.3 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the following facilities shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer’s specifications:

Coating Operation:

(a) Chain-on-edge #2 coating operation:
   (1) PB1 (Chain-on-edge #2 North, Station 130-1)
   (2) PB2 (Chain-on-edge #2 West, Station 130-2)
   (3) PB3 (Chain-on-edge #2 South, Station 130-3)

(b) Chain-on-edge #1 coating operation:
   (1) PB4 (Chain-on-edge #1 West, Station 126-1)
   (2) PB5 (Chain-on-edge #1 South, Station 126-2)
   (3) PB14 (Chain-on-edge #1 East, Station 126-3)

(c) PB6 (Station 120)
(d) PB10 (Station 119)
(e) PB12 (Station 122)
(f) PB20 (Station 121)
(g) PB21 (Station 121)
(h) TSA1 (Station 125)
   (1) TSA1 - HVLP1
   (2) TSA1 - HVLP2

D.1.4 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the facilities in the table below shall not exceed the pounds per hour limit when operating at the given process weight rate:
The pounds per hour limitations were calculated with the following equation:

\[ E = 4.10 \cdot P^{0.67} \]

where

- \( E \) = rate of emission in pounds per hour
- \( P \) = process weight rate in tons per hour

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

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

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

**D.1.6 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2][326 IAC 8-1-4]**

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows:

(a) Monthly VOC emission shall be calculated with the following equation:

\[ VOC = VOC_{mix} + VOC_{mill} + VOC_{coat} \]

Where:

- \( VOC_{mix} \) = VOC emissions from banbury mixers (tons/month)
- \( VOC_{mill} \) = VOC emissions from RPRCSS rubber making mills (tons/month)
- \( VOC_{coat} \) = VOC emissions from coating operation (tons/month)

For the equations below, the maximum VOC emission factors shall be from the most recent version of the U.S. EPA's AP-42, Chapter 4.12

(b) VOC emissions (\( VOC_{mix} \)) from the banbury mixers (PMIX, NEMIX, SBMIX, and R&D MIX) shall be calculated using the following equation:

\[ VOC_{mix} \text{ (tons/month)} = \frac{R_{mix} \cdot MEF_{mix}}{2000} \]

Where:

- \( R_{mix} \) = pounds of rubber mixed per month; and
- \( MEF_{mix} \) = 2.91 \times 10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds mixed that month

(c) VOC emissions from the RPRCSS rubber making mills (PMILL, SMILL, NEMILL, and R&D MILL) shall be calculated using the following equation:

\[ VOC_{mill} \text{ (tons/month)} = \frac{R_{mill} \cdot MEF_{mill}}{2000} \]

Where:

- \( R_{mill} \) = pounds of rubber milled per month; and
- \( MEF_{mill} \) = 1.13 \times 10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds milled that month
(d) VOC emissions (VOCcoat, tons/month) from surface coating units, including coatings, dilution solvents, and cleaning solvents, shall be the VOC input, which shall be calculated as determined in Condition D.1.7.

D.1.7 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC input limit contained in Conditions D.1.1 and D.1.2 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” and “as applied” VOC 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) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling
   
   (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
   
   (B) If multiple VOC waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
   
   (C) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

      (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
      
      (ii) An operational change in the coating application or cleanup operations.

   The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC emission limits contained in Conditions D.1.1 and D.1.2 shall be determined not later than 30 days after the end of each month. This shall be based on the total VOC used for the previous month, minus the VOC shipped off-site, and adding it
to the previous 11 months total VOC usage, minus the VOC shipped off-site, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

\[
VOC \text{ input} = VOC_U - VOC_R
\]

Where

\[
VOC_U = \text{The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and}
\]

\[
VOC_R = \text{The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.}
\]

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

D.1.8 Surface Coating Particulate Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operation stacks (S3, S4, S5, S8, S9, S18, S19, S22, S23, S24, S26, S27, S29) while the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks (S3, S4, S5, S8, S9, S18, S19, S22, S23, S24, S26, S27, S29) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the following records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

(1) The amount by weight and type of rubber compounds mixed and milled each month.

(2) Monthly calculations demonstrating the weight of the VOC emitted for each compliance period.

(b) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.
(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage.

(4) The total VOC usage for each month.

(5) If the amount of VOC in the waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.7, then the following records shall be maintained:

(A) The amount of VOC containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC content of the waste as determined pursuant to Condition D.1.7(b).

(C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed of, for each compliance period.

(6) The weight of VOC emitted for each compliance period.

(c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily filter inspections and monthly overspray inspections of the sides of the building and the nearby ground.

(d) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements 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 meets the requirements of 326 IAC 2-7-6(1) by a responsible official as defined by 326 IAC 2-7-1(35).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Blasters:

(l) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.

(m) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.

(n) One (1) steel shot blaster, identified as Blaster 2, installed in January 2004, with a nominal capacity of 477.3 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 12,240 pounds of steel shot per hour, using a self-contained vacuum (CB2) for particulate control, and exhausting indoors.

(o) One (1) grit blaster, identified as Blaster 3, installed in November 2004, with a nominal capacity of 350.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 2,312.7 pounds of aluminum oxide per hour, using a self-contained vacuum (CB3) for particulate control, and exhausting indoors.

(p) One (1) grit blaster, identified as Blaster 4, installed in 2005, with a nominal capacity of 80.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.

(q) One (1) grit blaster, identified as Blaster 5, installed in 2008, with a nominal capacity of 100.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.

(r) One (1) metal casing steel shot blaster, identified as Blaster 6, installed in 2011, with a nominal capacity of 2,143 pounds of parts and steel shot per hour, using a dust collector (CB6) for particulate control, and exhausting indoors.

(s) One (1) grit blasting cabinet, identified as Blaster 7, installed in 2017, equipped with four (4) nozzles on a turntable, with a nominal capacity of 500 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 680 pounds of aluminum oxide per hour, using a dust collector (CB5) for particulate control, and exhausting indoors.

(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 2-7-5(1)]

D.2.1 PSD Minor Limits: PM, PM$_{10}$, and PM$_{2.5}$ [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following after control limits:
Compliance with these limits, combined with the potential to emit PM, PM\textsubscript{10}, and PM\textsubscript{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM\textsubscript{10}, and PM\textsubscript{2.5} to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 Particulate Matter Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the facilities in the table below shall not exceed the pounds per hour limit when operating at the given process weight rate:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM\textsubscript{10} Limit (lbs/hr)</th>
<th>PM\textsubscript{2.5} Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>Baghouse (CB1)</td>
<td>3.57</td>
<td>3.57</td>
<td>3.57</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>Baghouse (CB1)</td>
<td>2.50</td>
<td>2.50</td>
<td>2.50</td>
</tr>
<tr>
<td>Blaster 2</td>
<td>Self-contained vacuum (CB2)</td>
<td>14.16</td>
<td>14.16</td>
<td>14.16</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>Self-contained vacuum (CB3)</td>
<td>4.97</td>
<td>4.97</td>
<td>4.97</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.31</td>
<td>2.31</td>
<td>2.31</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.35</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

The pounds per hour limitations were calculated with the following equation:

\[
E = 4.10 P^{0.67}
\]

where \(E\) = rate of emission in pounds per hour and \(P\) = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.4 Particulate Control

(a) In order to assure compliance with Conditions D.2.1 and D.2.2, the baghouse, identified as CB1, for particulate control shall be in operation and control emissions from the two (2) abrasive blasters, identified as Blaster 1a and Blaster 10, at all times Blaster 1a and/or Blaster 10 are in operation.

(b) In order to assure compliance with Conditions D.2.1 and D.2.2, the self-contained vacuums, identified as CB2, CB3, and CB4, for particulate control shall be in operation.
and control emissions from the abrasive blasters, identified as Blaster 2, Blaster 3, Blaster 4, and Blaster 5, at all times the respective facility is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

**D.2.5 Visible Emissions Notations [40 CFR 64]**

(a) Visible emission notations of the baghouse CB1 from Blaster 1a and Blaster 10 stack exhausts, stack S2, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.

Compliance with this is also required under 40 CFR 64, CAM, for PM, PM10 and PM2.5 for Blaster 1a and Blaster 10.

**D.2.6 Parametric Monitoring [40 CFR 64]**

The Permittee shall record the pressure drop across baghouse CB1 at least once per day when the associated Blaster 1a and/or Blaster 10 units are in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

Compliance with this is also required under 40 CFR 64, CAM, for PM, PM10 and PM2.5 for Blaster 1a and Blaster 10.

**D.2.7 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.

D.2.8 Self-Contained Vacuum Inspections [40 CFR 64]

The Permittee shall perform semi-annual inspections of the self-contained vacuums controlling particulate emissions from the blasters, identified as Blaster 2 through Blaster 5, to verify that they are 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/filters shall be replaced.

Compliance with this is also required under 40 CFR 64, CAM, for PM, PM\(_{10}\) and PM\(_{2.5}\) for Blaster 2.

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Blaster 1a and Blaster 10 baghouse (CB1) stack exhausts (Stack S2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of pressure drop across the Blaster 1a and Blaster 10 baghouse (CB1). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the dates and results of the inspections.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.3 EMISIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers:

(t) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 MMBtu per hour, and exhausting to stack S-BLR3.

Under 40 CFR Part 63, Subpart DDDDD, BLR3 is considered an affected facility.

(u) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 MMBtu per hour, and exhausting to stack S-BLR4.

Under 40 CFR Part 60, Subpart Dc, BLR4 is considered an affected facility.

Under 40 CFR Part 63, Subpart DDDDD, BLR4 is considered an affected facility.

(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 2-7-5(1)]

D.3.1 Particulate Matter Limits [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>BLR3</td>
<td>0.47</td>
</tr>
<tr>
<td>Boiler</td>
<td>BLR4</td>
<td>0.48</td>
</tr>
</tbody>
</table>

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION D.4  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Miscellaneous:

(w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

(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 2-7-5(1)]

D.4.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.
(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.4.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

   (1) The name and address of the solvent supplier.
   (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
   (3) The type of solvent purchased.
   (4) The total volume of the solvent purchased.
   (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1
NESHAP

Emissions Unit Description:

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

(1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3.

(2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4.

(3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5.

(4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

Under 40 CFR Part 63, Subpart MMMM, PB1, PB2, and PB3 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB1, PB2, and PB3 are considered affected facilities.

(b) Chain-on-edge #1 coating operation, consisting of the following:

(1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.

(2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.

(3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.

(4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

Under 40 CFR Part 63, Subpart MMMM, PB4, PB5, and PB14 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB4, PB5, and PB14 are considered affected facilities.

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.
Under 40 CFR Part 63, Subpart MMMM, PB6 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB6 is considered an affected facility.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a
HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour,
using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped
with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per
hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped
with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per
hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for
construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal,
plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting
to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for
construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal,
plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting
to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for
construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no
control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal
capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack
S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to
Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.
(k) One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

1. Three (3) electric pre-heat ovens, exhausting to stack S23.
2. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP1, using a dry filter for particulate control, and exhausting to stack S23.
3. One (1) electric flash oven, exhausting to stack S23.
4. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP2, using a dry filter for particulate control, and exhausting to stack S23.
5. Three (3) electric drying ovens, exhausting to stack S23.

Under 40 CFR Part 63, Subpart MMMM, TSA1 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, TSA1 is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMM.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM][326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMMM (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-80, for the emission units listed above:

1. 40 CFR 63.3880
2. 40 CFR 63.3881(a)(1), (a)(2), (a)(5), (b), (e)
3. 40 CFR 63.3882(a), (b), (e)
4. 40 CFR 63.3890(b)(1), (b)(4), (c)
5. 40 CFR 63.3891(a), (b)
6. 40 CFR 63.3892(a)
7. 40 CFR 63.3893(a)
8. 40 CFR 63.3900(a)(1)
(9) 40 CFR 63.3901
(10) 40 CFR 63.3910
(11) 40 CFR 63.3920(a)(1)-(6)
(12) 40 CFR 63.3930(a), (b), (c)(1)-(3), (d), (e), (f), (g), (h), (j)
(13) 40 CFR 63.3931
(14) 40 CFR 63.3940
(15) 40 CFR 63.3941
(16) 40 CFR 63.3942
(17) 40 CFR 63.3950
(18) 40 CFR 63.3951
(19) 40 CFR 63.3952
(20) 40 CFR 63.3980
(21) 40 CFR 63.3981
(22) Table 2
(23) Table 3
(24) Table 4
SECTION E.2  NESHAP

Emissions Unit Description:

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

   (1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3.

   (2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4.

   (3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5.

   (4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

Under 40 CFR Part 63, Subpart MMMM, PB1, PB2, and PB3 are considered affected facilities. Under 40 CFR Part 63, Subpart PPPP, PB1, PB2, and PB3 are considered affected facilities.

(b) Chain-on-edge #1 coating operation, consisting of the following:

   (1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.

   (2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.

   (3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.

   (4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to Stack S10, and Ovens 17 and 18, and exhausting to stack S30.

Under 40 CFR Part 63, Subpart MMMM, PB4, PB5, and PB14 are considered affected facilities. Under 40 CFR Part 63, Subpart PPPP, PB4, PB5, and PB14 are considered affected facilities.

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.
Under 40 CFR Part 63, Subpart MMMM, PB6 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB6 is considered an affected facility.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.
(k) One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

1. Three (3) electric pre-heat ovens, exhausting to stack S23.
2. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP1, using a dry filter for particulate control, and exhausting to stack S23;
3. One (1) electric flash oven, exhausting to stack S23.
4. One (1) automatic HVLP spray applicator, identified as TSA1 - HVLP2, using a dry filter for particulate control, and exhausting to stack S23.
5. Three (3) electric drying ovens, exhausting to stack S23.

Under 40 CFR Part 63, Subpart MMMM, TSA1 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, TSA1 is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart PPPP.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.2.2 Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-81, for the emission units listed above:

1. 40 CFR 63. 4481(e)
SECTION E.3

NSPS

Emissions Unit Description:

Boilers:

(u) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 MMBtu per hour, and exhausting to stack S-BLR4.

Under 40 CFR Part 60, Subpart Dc, BLR4 is considered an affected facility.
Under 40 CFR Part 63, Subpart DDDDD, BLR4 is considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit listed above, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

E.3.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12][40 CFR Part 60, Subpart Dc]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit listed above:

(1) 60.40c(a)
(2) 60.41c
(3) 60.48c(a), (g)(2), and (i)
SECTION E.4  NESHAP

**Emissions Unit Description:**

**Boilers:**

(t) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 MMBtu per hour, and exhausting to stack S-BLR3.

Under 40 CFR Part 63, Subpart DDDDD, BLR3 is considered an affected facility.

(u) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 MMBtu per hour, and exhausting to stack S-BLR4.

Under 40 CFR Part 60, Subpart Dc, BLR4 is considered an affected facility.

Under 40 CFR Part 63, Subpart DDDDD, BLR4 is considered an affected facility.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.4.2  Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [40 CFR Part 63, Subpart DDDDD][326 IAC 20-95]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDD (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 20-95, for the emission units listed above:

(1) 40 CFR 63.7480
(2) 40 CFR 63.7485
(3) 40 CFR 63.7490(a)(1), (d)
(4) 40 CFR 63.7495(b), (d)
(5) 40 CFR 63.7499
(6) 40 CFR 63.7500(a)(1), (e), (f)
(7) 40 CFR 63.7505(a)
(8) 40 CFR 63.7510(e)
(9) 40 CFR 63.7515(d)
(10) 40 CFR 63.7530(e)
<table>
<thead>
<tr>
<th></th>
<th>Section(s) referenced</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>40 CFR 63.7540(a)(10), (a)(11), (a)(13), (b), (d)</td>
</tr>
<tr>
<td>12</td>
<td>40 CFR 63.7545(a), (b), (e)(1), (e)(8)(i)-(ii)</td>
</tr>
<tr>
<td>13</td>
<td>40 CFR 63.7550(a), (b), (c)(1), (c)(5)(i)-(iv), (c)(5)(xiv), (h)(3)</td>
</tr>
<tr>
<td>14</td>
<td>40 CFR 63.7555(a)</td>
</tr>
<tr>
<td>15</td>
<td>40 CFR 63.7560</td>
</tr>
<tr>
<td>16</td>
<td>40 CFR 63.7565</td>
</tr>
<tr>
<td>17</td>
<td>40 CFR 63.7570</td>
</tr>
<tr>
<td>18</td>
<td>40 CFR 63.7575</td>
</tr>
<tr>
<td>19</td>
<td>Table 3</td>
</tr>
<tr>
<td>20</td>
<td>Table 9</td>
</tr>
<tr>
<td>21</td>
<td>Table 10</td>
</tr>
</tbody>
</table>
Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002

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:
Phone:
Date:
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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002

This form consists of 2 pages
Page 1 of 2

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  ● 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
  ● 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 2-7-16.

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Equipment:</td>
</tr>
<tr>
<td>Permit Condition or Operation Limitation in Permit:</td>
</tr>
<tr>
<td>Description of the Emergency:</td>
</tr>
<tr>
<td>Describe the cause of the Emergency:</td>
</tr>
</tbody>
</table>
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date/Time Emergency was corrected:</th>
</tr>
</thead>
</table>

| Was the facility being properly operated at the time of the emergency? | Y | N |
|-----------------------------------------------------------------------|

<table>
<thead>
<tr>
<th>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Estimated amount of pollutant(s) emitted during emergency:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Describe the steps taken to mitigate the problem:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Describe the corrective actions/response steps taken:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Describe the measures taken to minimize emissions:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>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:</th>
</tr>
</thead>
</table>

Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
# Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Surface coating (PB1 through PB6, PB10, PB12 through PB14, PB20 through PB22, DIP1, and TSA1), Banbury mixers (PMIX, NEMIX, SBMIX, R&D MIX), RPRCSS rubber making mills (PMILL, SMILL, NEMILL, R&D MILL)
Parameter: VOC emissions
Limit: Shall not exceed 246.00 tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
</tbody>
</table>

- □ 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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Robotic adhesive application booth (PB21) of Station 121
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER : _______________       YEAR: _______________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

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

Submitted by: ________________________________
Title / Position: ______________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
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".

**NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response StepsTaken:</td>
</tr>
</tbody>
</table>

If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
Indiana Department of Environmental Management  
Office of Air Quality  
Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

**Source Description and Location**

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>BRC Rubber &amp; Plastics, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>623 West Monroe Street, Montpelier, Indiana 47359</td>
</tr>
<tr>
<td>County:</td>
<td>Blackford</td>
</tr>
</tbody>
</table>
| SIC Code: | 3069 (Fabricated Rubber Products, Not Elsewhere Classified)  
| | 3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified) |
| Operation Permit No.: | T 009-39987-00002 |
| Operation Permit Issuance Date: | February 19, 2019 |
| Significant Source Modification No.: | 009-43813-00002 |
| Significant Permit Modification No.: | 009-43940-00002 |
| Permit Reviewer: | Hachem Ismail Alaoui |

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. 009-39987-00002 on February 19, 2019. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Blackford County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅  
Blackford County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants

Blackford 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) 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 modification, 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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Modification (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>211.12</td>
<td>202.08</td>
<td>202.08</td>
<td>0.06</td>
<td>9.96</td>
<td>249.33</td>
<td>8.37</td>
<td>36.76</td>
<td>70.22</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂₅ listed is direct PM₂₅.
³Single 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 a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.

(c) These emissions are based on the TSD of Part 70 renewal No. 009-39987-00002, issued on February 19, 2019.

---

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an application, submitted by BRC Rubber & Plastics, Inc. on March 1, 2021, relating to the following:

1. Addition of one (1) robotic primer coating booth, one (1) robotic adhesive coating booth, one (1) dip and spin coating line, one (1) steel shot blaster, and one (1) automatic phosphate line.

2. Removal of a vertical chain-on edge adhesive application operation (station 127), one (1) adhesive application booth (PB11), one (1) roll coater adhesive application system (RC1), one (1) hand dip coating line (SMDIP), and one (1) vapor degreaser (VDG1).

3. Application of a new paint material, the usage of the mixing ratios between the paint material and the solvents of the primer or adhesive to the thinners, and the change cleaning solvent to a non-VOC and HAP material. Due to these modifications, the VOC and HAP emissions have decreased.

The following is a list of the new emission units and pollution control device(s):

(a) One (1) robotic primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(b) One (1) robotic adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(c) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility. Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(d) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.
(e) One (1) automatic phosphate line, identified as Phosline #3, approved in 2021 for construction, using no control, exhausting indoors, and consisting of the following:

1. One (1) alkaline soak tank with a maximum capacity of 800 gallons and a soaking rate of 85 gallons per month.
2. One (1) acid pickle tank with maximum capacity of 800 gallons and a soaking rate of 36 gallons per month.
3. One (1) phosphate tank with maximum capacity of 800 gallons and a soaking rate of 44 gallons per month.
4. One (1) sealer tank with maximum capacity of 800 gallons and a soaking rate of 43 gallons per month.

As part of this permitting action, the following emission units are being removed from the permit:

(f) Vertical chain-on-edge adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:

1. One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22.
2. One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22.
3. Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB7 and PB8 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB7 and PB8 are considered affected facilities.

(g) One (1) adhesive application booth, identified as PB11 (Station 121), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

Under 40 CFR Part 63, Subpart MMMM, PB11 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB11 is considered an affected facility.

(h) One (1) roll coater adhesive application system, identified as RC1 (Station 124), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

Under 40 CFR Part 63, Subpart MMMM, RC1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, RC1 is considered an affected facility.

(i) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, SMDIP is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, SMDIP is considered an affected facility.
One (1) vapor degreaser, identified as VDG1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S1.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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 2-7-10.5. This table reflects the PTE before controls. 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.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robotic Primer Booth (PB20)</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>--</td>
<td>--</td>
<td>12.50</td>
<td>--</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td>Robotic Adhesive Booth (PB21)</td>
<td>15.06</td>
<td>15.06</td>
<td>15.06</td>
<td>--</td>
<td>--</td>
<td>80.36</td>
<td>--</td>
<td>12.20</td>
<td>14.69</td>
</tr>
<tr>
<td>Dip and Spin Coating Line (PB22)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>8.57</td>
<td>--</td>
<td>0.70</td>
<td>0.72</td>
</tr>
<tr>
<td>Steel Shot Blaster 10</td>
<td>109.81</td>
<td>109.81</td>
<td>109.81</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Automatic Phosline #3</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>130.46</td>
<td>130.46</td>
<td>130.46</td>
<td>--</td>
<td>--</td>
<td>101.42</td>
<td>--</td>
<td>11.71</td>
<td>15.47</td>
</tr>
</tbody>
</table>

1PM2.5 listed is direct PM2.5.
2Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

(1) Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM/PM10/direct PM2.5 and VOC at equal to or greater than twenty-five (25) tons per year.

(2) Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit equal to or greater than ten (10) tons per year of a single HAP.
(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

### Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and/or permit modification, 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.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robotic Primer Booth (PB20)</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Robotic Adhesive Booth (PB21)</td>
<td>15.06</td>
<td>15.06</td>
<td>15.06</td>
<td>--</td>
<td>--</td>
<td>246.0</td>
<td>--</td>
</tr>
<tr>
<td>Dip and Spin Coating Line (PB22)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Steel Shot Blaster 10</td>
<td>109.81</td>
<td>109.81</td>
<td>109.81</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Automatic Phosline #3</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total for Modification</strong></td>
<td><strong>130.46</strong></td>
<td><strong>130.46</strong></td>
<td><strong>130.46</strong></td>
<td><strong>--</strong></td>
<td><strong>--</strong></td>
<td><strong>&lt;250</strong></td>
<td><strong>--</strong></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
</tr>
</tbody>
</table>

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

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

(a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### PTE of the Entire Source After Issuance of the Part 70 Modification

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 Part 70 source and/or permit modification, 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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
<th>Total HAP&lt;sup&gt;3&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitives</strong></td>
<td>247.07</td>
<td>238.03</td>
<td>238.03</td>
<td>0.06</td>
<td>9.96</td>
<td>248.23</td>
<td>8.37</td>
<td>15.87</td>
<td>37.00</td>
</tr>
</tbody>
</table>
The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) for more information regarding the limit(s).

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

(b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do not coat metal furniture.

(b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do not assemble automobiles or light duty trucks.

(c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR and 326 IAC 12, are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do not coat pressure sensitive tape or labels.

(d) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS and 326 IAC 12, are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do coat large appliances.

(e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT and 326 IAC 12, are not included in the permit for the robotic primer booth.
(PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do coat metal coils.

(f) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW and 326 IAC 12, are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do not coat beverage cans.

(g) The requirements of the New Source Performance Standard for Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT and 326 IAC 12, are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), because these units do coat plastic parts for business machines.

(h) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

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

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63, Subpart IIII and 326 IAC 20-85 are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since these units do not coat new automobiles or new light duty trucks.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK and 326 IAC 20-86 are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since these units do not coat metal cans.

(c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, which is incorporated by reference as 326 IAC 20-80, because the source uses more than 100 gallons or more of coatings containing HAPs, coats miscellaneous metal parts and products, and is a major source of HAPs.

The emission units subject to this rule include the following:

(i) One (1) robotic primer application booth identified as PB20.
(ii) One (1) robotic adhesive application booth identified as PB21.
(iii) One (1) dip and spin coating line identified as PB22.

These emission units are subject to the following portions of Subpart MMMM:

1. 40 CFR 63.3880
2. 40 CFR 63.3881(a)(1), (a)(2), (a)(5), (b), (e)
3. 40 CFR 63.3882(a), (b), (e)
4. 40 CFR 63.3890(b)(1), (b)(4), (c)
5. 40 CFR 63.3891(a), (b)
6. 40 CFR 63.3892(a)
7. 40 CFR 63.3893(a)
8. 40 CFR 63.3900(a)(1)
9. 40 CFR 63.3901
10. 40 CFR 63.3910
11. 40 CFR 63.3920(a)(1)-(6)
12. 40 CFR 63.3930(a), (b), (c)(1)-(3), (d), (e), (f), (g), (h), (i)
13. 40 CFR 63.3931
14. 40 CFR 63.3940
The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), except as otherwise specified in 40 CFR 63, Subpart MMMM.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN and 326 IAC 20-63 are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since these units do not coat large appliances.

(e) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP, which is incorporated by reference as 326 IAC 20-81, because the source uses more than 250 gallons or more of coatings containing HAPs, coats miscellaneous plastic parts and products, and is a major source of HAPs.

The emission units subject to this rule include the following:

(i) One (1) robotic primer application booth identified as PB20.
(ii) One (1) robotic adhesive application booth identified as PB21.
(iii) One (1) dip and spin coating line identified as PB22.

These emission units are subject to the following portions of Subpart PPPP:

(1) 40 CFR 63.4481(e)

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), except as otherwise specified in 40 CFR 63, Subpart PPPP.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR and 326 IAC 20-78 are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since these units do not coat metal furniture.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS and 326 IAC 20-64 are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since these units do not coat metal coil.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH are not included in the permit for the robotic primer booth (PB20), robotic adhesive booth (PB21), and dip and spin coating line (PB22), since this source is an area source of HAPs.
Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robotic Primer Booth (PB20) / PM*</td>
<td>Dry Filter (CPB20)</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Robotic Primer Booth (PB20) / PM10 and PM2.5</td>
<td>Dry Filter (CPB20)</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Robotic Adhesive Booth (PB21) / PM*</td>
<td>Dry Filter (CPB21)</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Robotic Adhesive Booth (PB21) / PM10 and PM2.5</td>
<td>Dry Filter (CPB21)</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Dip and Spin Coating Line (PB22)</td>
<td>N</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Steel Shot Blaster (Blaster 10) / PM*</td>
<td>Baghouse (CB1)</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Steel Shot Blaster (Blaster 10) / PM10</td>
<td>Baghouse (CB1)</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Steel Shot Blaster (Blaster 10) / PM2.5</td>
<td>Baghouse (CB1)</td>
<td>326 IAC 2-2</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Steel Shot Blaster (Blaster 10) / PM*</td>
<td>Baghouse (CB1)</td>
<td>326 IAC 6-3-2</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>Automatic Phosline #3</td>
<td>N</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

N 1 CAM does not apply for pollutant because the uncontrolled PTE of pollutant is less than the major source threshold.

N 2 Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.
### Emission Unit/Pollutant

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Emission units without air pollution controls are not subject to CAM. Therefore, the units listed in this table are not subject to CAM requirements.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to steel shot blaster, identified as Blaster 10, which is considered as an "other unit,” for PM, PM10, and PM2.5 upon issuance of the Part 70 Permit Renewal. A CAM plan must be submitted as part of the Part 70 Operating Permit Renewal application.

### State Rule Applicability - Entire Source

Due to this modification, 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 Permit Level Determination – PSD and Emission Offset section and the Permit Level Determination - PSD Emissions Increase and the Permit Level Determination - Emission Offset Emissions Increase section of this document.

**PSD Minor Source Limits**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The total VOC input, including coatings, dilution solvents, and cleaning solvents, to the following coating operations and total input of rubber ingredients to the following mixing and milling lines shall be limited such that the VOC emissions shall not exceed 246.00 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month:

**Coating Operation:**

(1) Chain-on-edge #2 coating operation:
   (a) PB1 (Chain-on-edge #2 North, Station 130-1)
   (b) PB2 (Chain-on-edge #2 West, Station 130-2)
   (c) PB3 (Chain-on-edge #2 South, Station 130-3)

(2) Chain-on-edge #1 coating operation:
   (a) PB4 (Chain-on-edge #1 West, Station 126-1)
   (b) PB5 (Chain-on-edge #1 South, Station 126-2)
   (c) PB14 (Chain-on-edge #1 East, Station 126-3)

(3) PB6 (Station 120)
(4) PB10 (Station 119)
(5) PB12 (Station 122)
(6) PB13 (Station 123)
(7) PB20 (Station 121)
(8) PB21 (Station 121)
(9) PB22 (Station 116)
(10) DIP1 (Station 129)
(11) TSA1 (Station 125):
    (a) TSA1 – HVLP1
    (b) TSA1 – HVLP2

**Rubber Mixing and Milling Lines:**

(12) Primary mixing and milling line:
(a) Banbury mixer (PMIX)
(b) RPRCSS rubber making mill (PMILL)

(13) Secondary milling line:
(a) RPRCSS rubber making mill (SMILL)

(14) Mixing and milling line:
(a) Banbury mixer (NEMIX)
(b) RPRCSS rubber making mill (NEMILL)

(15) Small batch mixer (SMBIX)

Insignificant Activities:

(16) R&D mixing and milling line:
(a) Banbury mixer (R&DMIX)
(b) RPRCSS rubber making mill (RDMILL)

This limit has been modified through this significant source modification in order to:

(i) Incorporate the one (1) robotic primer application booth (PB21), the one (1) robotic adhesive application booth (PB21), and the one (1) dip and spin coating line (PB22).

(ii) Remove the three (3) adhesive application booths (PB7, PB8, and PB11), the one (1) roll coater adhesive application system (RC1), and the one (1) hand dip coating line (SMDIP).

(iii) To increase the VOC limit from 224 tons/year to 246 tons/year.

(b) The PM, PM10, and PM2.5 emissions after control from the following units shall not exceed the limits specified in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM10 Limit (lbs/hr)</th>
<th>PM2.5 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>Baghouse (CB1)</td>
<td>3.57</td>
<td>3.57</td>
<td>3.57</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>Baghouse (CB1)</td>
<td>2.50</td>
<td>2.50</td>
<td>2.50</td>
</tr>
<tr>
<td>Blaster 2</td>
<td>Self-contained vacuum (CB2)</td>
<td>14.16</td>
<td>14.16</td>
<td>14.16</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>Self-contained vacuum (CB3)</td>
<td>4.97</td>
<td>4.97</td>
<td>4.97</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.31</td>
<td>2.31</td>
<td>2.31</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.35</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

This limit has been modified through this significant source modification in order to incorporate the Blaster 10.

Compliance with these limits, combined with the potential to emit VOC, PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of VOC, PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).
(1) The operation of the robotic primer booth, identified as PB20, and the dip and spin coating line, identified as PB22, each 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.

(2) The operation of the robotic adhesive booth, identified as PB21, approved in 2021 for construction will emit equal to or greater than ten (10) tons per year for a single HAP AND/OR equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to this robotic adhesive booth, identified as PB21. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this robotic adhesive booth, identified as PB21 is specifically regulated under NESHAP 40 CFR 63, Subpart MMMM, and NESHAP 40 CFR 63, Subpart PPPP, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this robotic adhesive booth, identified as PB2, is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

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 Blackford 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 Blackford County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Blackford County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.
Due to this modification, state rule applicability has been reviewed as follows:

**Robotic Primer Application Booth (PB20)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the robotic primer application booth, identified as PB20, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from the to the robotic primer application booth, identified as PB20, shall be controlled by a dry particulate filter waterwash an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this robotic primer application booth, identified as PB20, 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.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a) the robotic primer application booth, identified as PB20, is not subject to the requirements of 326 IAC 8-2-9 because the source, not located in Lake or Porter County, does not coat metal parts or products as listed in 326 IAC 8-2-9(a)(1) or under the SIC code major groups #33-#39.

**Robotic Adhesive Application Booth (PB21)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the robotic adhesive application booth, identified as PB21, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from the to the robotic adhesive application booth, identified as PB21, shall be controlled by a dry particulate filter waterwash an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
This robotic adhesive application booth, identified as PB21, was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the robotic adhesive application booth, identified as PB21, is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the robotic adhesive application booth, identified as PB21, to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the robotic primer application booth, identified as PB20, is not subject to the requirements of 326 IAC 8-1-6.

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

1. The VOC input, including coatings, dilution solvents, and cleaning solvents, to the robotic adhesive application booth, identified as PB21, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a) the robotic adhesive application booth, identified as PB21, is not subject to the requirements of 326 IAC 8-2-9 because the source, not located in Lake or Porter County, does not coat metal parts or products as listed in 326 IAC 8-2-9(a)(1) or under the SIC code major groups #33-#39.

Dip and Spin Coating Line (PB22)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the dip and spin coating line, identified as PB22, is not subject to the requirements of 326 IAC 6-3, since this unit uses dip surface coating.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this dip and spin coating line, identified as PB22, 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.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(a) the dip and spin coating line, identified as PB22, is not subject to the requirements of 326 IAC 8-2-9 because the source, not located in Lake or Porter County, does not coat metal parts or products as listed in 326 IAC 8-2-9(a)(1) or under the SIC code major groups #33-#39.

Steel Shot Blaster (Blaster 10)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the steel shot blaster, identified as Blaster 10, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the steel shot blaster, identified as Blaster 10, shall not exceed 3.57 pounds per hour when operating at a process weight rate of 0.82 tons per hour. The pound per hour limitation was calculated with the following equation:

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and
\( P \) = process weight rate in tons per hour

The baghouse CB1 shall be in operation at all times the steel shot blaster, identified as Blaster 10, is in operation, in order to comply with this limit.

Automatic phosphate line (Phosline #3)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the automatic phosphate line, identified as Phosline #3, is not subject to the requirements of 326 IAC 6-3, since this unit uses dip surface coating.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions...
that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

**Testing Requirements:**

The new steel shot blaster, identified as Blaster 10, is controlled by the baghouse CB1. The same baghouse CB1 is used as control for the steel shot blaster, identified as Blaster 1a. A stack test was conducted for the steel shot blaster, identified as Blaster 1a was performed on November 6, 2013.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

<table>
<thead>
<tr>
<th>Control Device / Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robotic primer application booth (PB20) / Dry Filter (CPB20)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
<tr>
<td>Robotic adhesive application booth (PB21) / Dry Filter (CPB21)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
<tr>
<td>Steel shot blaster (Blaster 10) / Baghouse (CB1)</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
<tr>
<td></td>
<td>Pressure Drop Monitoring</td>
<td>Daily</td>
<td>3.0 to 6.0 inches of water</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filter CPB20 for the robotic primer application booth (PB20) must operate properly to assure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).

These monitoring conditions are necessary because the dry filter CPB21 for the robotic adhesive application booth (PB21) must operate properly to assure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).
These monitoring conditions are necessary because the Baghouse CB1 for the steel shot blaster (Blaster 10) must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), and 40 CFR 64 (Compliance Assurance Monitoring).

### Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as **bold** text (these changes may include Title I changes):

#### A.2 Emission Units and Pollution Control Equipment Summary

[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

**TABLE OF CONTENT**

*****

**Attachment E: National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (40 CFR 63, Subpart T)**

*****

**Coating Operation:**

*****

(d) Vertical chain-on-edge adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:

(1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22

(2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22

(3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB7 and PB8 are considered affected facilities.

Under 40 CFR Part 63, Subpart PPPP, PB7 and PB8 are considered affected facilities.

(d) (e) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.

Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB11 (Station 121), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or
rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

Under 40 CFR Part 63, Subpart MMMM, PB11 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB11 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) robotic primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) robotic adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) roll coater adhesive application system, identified as RC1 (Station 124), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

Under 40 CFR Part 63, Subpart MMMM, RC1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, RC1 is considered an affected facility.

(k) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.
Under 40 CFR Part 63, Subpart MMMM, SMDIP is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, SMDIP is considered an affected facility.

(k) One (1) coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

*****

Blasters:

(l) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.

(m) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.

*****

Miscellaneous:

*****

(w) One (1) vapor degreaser, identified as VDG1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S1.

Under 40 CFR Part 63, Subpart T, VDG1 is considered an affected facility.

(w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

Rubber Mixing and Milling Lines:

(x) One (1) primary mixing and milling line, with a nominal capacity of 3,500 pounds of rubber ingredients per hour, and consisting of:

1. One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, replaced in 2014, exhausting to Stack S16.

2. One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.

(y) One (1) secondary milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:

1. One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.

(z) One (1) mixing and milling line, installed in 2014, with a nominal capacity of 3,800 pounds of rubber ingredients per hour, and consisting of:
(1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE.

(2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

(aa) One (1) small batch mixer, identified as SBMIX, constructed in 2010, with a maximum capacity of 75 pounds of rubber ingredients per hour, using a dust collector for control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

(g) One (1) automatic phosphate line, identified as Phosline #3, approved in 2021 for construction, using no control, exhausting indoors, and consisting of the following:

(1) One (1) alkaline soak tank with a maximum capacity of 800 gallons and a soaking rate of 85 gallons per month.

(2) One (1) acid pickle tank with maximum capacity of 800 gallons and a soaking rate of 36 gallons per month.

(3) One (1) phosphate tank with maximum capacity of 800 gallons and a soaking rate of 44 gallons per month.

(4) One (1) sealer tank with maximum capacity of 800 gallons and a soaking rate of 43 gallons per month.

(g) (h) One (1) chlorination tank, installed in 2012, using no control, and exhausting indoors.

(h) (i) Four (4) electric ovens, installed in June 2004 and 2005, identified as:

(1) Three (3) heating ovens, identified as Oven 7, Oven 8 and Oven 9, exhausted to Stacks S13, S14, and S15, respectively.

(2) One (1) drying oven, identified as Oven 10, exhausted to Stack S16.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Coating Operation:

(d) Vertical chain-on-edge adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:
One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to Stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

One (1) adhesive application booth, identified as PB11 (Station 121), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

Under 40 CFR Part 63, Subpart MMMM, PB11 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB11 is considered an affected facility.

One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(i) One (1) roll coater adhesive application system, identified as RC1 (Station 124), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

Under 40 CFR Part 63, Subpart MMMM, RC1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, RC1 is considered an affected facility.

(k) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, SMDIP is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, SMDIP is considered an affected facility.

(k) One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

Rubber Mixing and Milling Lines:

(x) One (1) primary mixing and milling line, with a nominal capacity of 3,500 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, replaced in 2014, exhausting to Stack S16.

(2) One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.

(y) One (1) secondary milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.

(1) One (1) mixing and milling line, installed in 2014, with a nominal capacity of 3,800 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE.
(2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

(aa) One (1) small batch mixer, identified as SBBMIX, constructed in 2010, with a maximum capacity of 75 pounds of rubber ingredients per hour, using a dust collector for control, and exhausting indoors.

(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 2-7-5(1)]

D.1.1 PSD Minor Limits: Volatile Organic Compounds (VOC) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC input, including coatings, dilution solvents, and cleaning solvents, to the following coating operations and total input of rubber ingredients to the following mixing and milling lines shall be limited such that the VOC emissions shall not exceed 246.00 224 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month:

Coating Operation:
(a) Chain-on-edge #2 coating operation:
   (1) PB1 (Chain-on-edge #2 North, Station 130-1)
   (2) PB2 (Chain-on-edge #2 West, Station 130-2)
   (3) PB3 (Chain-on-edge #2 South, Station 130-3)
(b) Chain-on-edge #1 coating operation:
   (1) PB4 (Chain-on-edge #1 West, Station 126-1)
   (2) PB5 (Chain-on-edge #1 South, Station 126-2)
   (3) PB14 (Chain-on-edge #1 East, Station 126-3)
(c) PB6 (Station 120)
(d) Vertical chain-on-edge adhesive application operation (Station 127):
   (1) PB7
   (2) PB8
   (d) PB10 (Station 119)
   (e) PB11 (Station 121)
   (f) PB12 (Station 122)
   (g) PB13 (Station 123)
   (h) PB20 (Station 121)
   (i) PB21 (Station 121)
   (j) PB22 (Station 116)
   (i) RC1 (Station 124)
   (k) DIP1 (Station 129)
   (k) SMDIP (Station 116)
   (l) TSA1 (Station 125):
      (1) TSA1 – HVLP1
      (2) TSA1 – HVLP2

*****

D.1.2 Volatile Organic Compound (VOC) Emission Limits [326 IAC 8-1-6]

*****

The VOC input, including coatings, dilution solvents, and cleaning solvents, to robotic adhesive booth PB21 (Station 121) the following facilities shall each be limited to less than twenty-five
(25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(a) Chain-on-edge #2 coating operation:
   (1) PB1 (Chain-on-edge #2 North, Station 130-1)
   (2) PB2 (Chain-on-edge #2 West, Station 130-2)
   (3) PB3 (Chain-on-edge #2 South, Station 130-3)

(b) Vertical chain-on-edge adhesive application operation (Station 127):
   (1) PB7
   (2) PB8

(c) RC1 (Station 124)

*****

D.1.3 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the following facilities shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer’s specifications:

Coating Operation:

(a) Chain-on-edge #2 coating operation:
   (1) PB1 (Chain-on-edge #2 North, Station 130-1)
   (2) PB2 (Chain-on-edge #2 West, Station 130-2)
   (3) PB3 (Chain-on-edge #2 South, Station 130-3)

(b) Chain-on-edge #1 coating operation:
   (1) PB4 (Chain-on-edge #1 West, Station 126-1)
   (2) PB5 (Chain-on-edge #1 South, Station 126-2)
   (3) PB14 (Chain-on-edge #1 East, Station 126-3)

(c) PB6 (Station 120)

(d) Vertical chain-on-edge adhesive application operation (Station 127):
   (1) PB7
   (2) PB8

(d) PB10 (Station 119)
(f) PB11 (Station 121)
(e) PB12 (Station 122)
(f) PB20 (Station 121)
(g) PB21 (Station 121)
(h) TSA1 (Station 125)
   (1) TSA1 – HVLP1
   (2) TSA1 – HVLP2

*****

D.1.8 Surface Coating Particulate Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operation stacks (S3, S4, S5, S8, S9, S18, S19, S22, S23, S24, S25, S26, S27, S29) while the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks (S3, S4, S5, S8, S9, S18, S19, S22, S23, S24, S25, S26, S27, S29) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the
Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

****

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Blasters:

(i) (mm) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.

(m) One (1) steel shot blaster, identified as Blaster 10, approved in 2021 for construction, with a maximum capacity of 1,600 pounds of parts per hour and 30 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, and exhausting to Stack S2.

(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 2-7-5(1)]

D.2.1 PSD Minor Limits: PM, PM_{10}, and PM_{2.5} [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following after control limits:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM_{10} Limit (lbs/hr)</th>
<th>PM_{2.5} Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>Baghouse (CB1)</td>
<td>3.57</td>
<td>3.57</td>
<td>3.57</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>Baghouse (CB1)</td>
<td>2.50</td>
<td>2.50</td>
<td>2.50</td>
</tr>
<tr>
<td>Blaster 2</td>
<td>Self-contained vacuum (CB2)</td>
<td>14.16</td>
<td>14.16</td>
<td>14.16</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>Self-contained vacuum (CB3)</td>
<td>4.97</td>
<td>4.97</td>
<td>4.97</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.31</td>
<td>2.31</td>
<td>2.31</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>Self-contained vacuum (CB4)</td>
<td>2.35</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

****

D.2.2 Particulate Matter Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the facilities in the table below shall not exceed the pounds per hour limit when operating at the given process weight rate:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Process Weight Rate P (tons/hr)</th>
<th>Particulate Emission Limit E (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>0.82</td>
<td>3.57</td>
</tr>
<tr>
<td>Emission Unit</td>
<td>Maximum Process Weight Rate P (tons/hr)</td>
<td>Particulate Emission Limit E (lbs/hr)</td>
</tr>
<tr>
<td>---------------</td>
<td>----------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>0.82</td>
<td>3.57</td>
</tr>
<tr>
<td>Blaster 2</td>
<td>6.36</td>
<td>14.16</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>1.33</td>
<td>4.97</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>0.43</td>
<td>2.31</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>0.44</td>
<td>2.35</td>
</tr>
<tr>
<td>Blaster 6</td>
<td>1.07</td>
<td>4.29</td>
</tr>
<tr>
<td>Blaster 7</td>
<td>0.59</td>
<td>2.88</td>
</tr>
</tbody>
</table>

*****

D.2.4 Particulate Control

(a) In order to assure compliance with Conditions D.2.1 and D.2.2, the baghouse, identified as CB1, for particulate control shall be in operation and control emissions from the two (2) abrasive blasters, identified as Blaster 1a and Blaster 10, at all times Blaster 1a and/or Blaster 10 are in operation.

*****

D.2.5 Visible Emissions Notations [40 CFR 64]

(a) Visible emission notations of the baghouse CB1 from Blaster 1a and Blaster 10 stack exhausts, stack S2, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

*****

Compliance with this is also required under 40 CFR 64, CAM, for PM, PM10 and PM2.5 for Blaster 1a and Blaster 10.

*****

D.2.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across baghouse CB1 at least once per day when the associated Blaster 1a and/or Blaster 10 units are in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

Compliance with this is also required under 40 CFR 64, CAM, for PM, PM10 and PM2.5 for Blaster 1a and Blaster 10.

*****

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Blaster 1a and Blaster 10 baghouse (CB1) stack exhausts (Stack S2). The Permittee shall include in its daily record when a
visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of pressure drop across the Blaster 1a and Blaster 10 baghouse (CB1). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day)

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Miscellaneous:

(w) One (1) vapor degreaser, identified as VDG1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S1.

Under 40 CFR Part 63, Subpart T, VDG1 is considered an affected facility.

(w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

(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 2-7-5(1)]

D.4.1 Open Top Vapor Degreaser Operation [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operation), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

(2) Keep the cover closed at all times except when processing workloads through the degreaser.

(3) Minimize solvent carryout by:

(A) racking parts to allow complete drainage;

(B) moving parts in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute)

(C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(D) tipping out any pools of solvent on the cleaned parts before removal
(E) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry.

(4) Prohibit the entrance into the degreaser of porous or absorbent materials, such as cloth, leather, wood or rope.

(5) Prohibit the occupation of more than one-half (1/2) of the degreaser's open top area with the workload.

(6) Prohibit the loading of the degreaser in a manner that causes the vapor level to drop more than fifty percent (50%) of the vapor depth when the workload is removed.

(7) Prohibit solvent spraying above the vapor level.

(8) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.

(9) Store waste solvent only in closed containers.

(10) Prohibit the disposal or transfer of waste solvent in a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(11) Prohibit the use of workplace fans near the degreaser opening.

(12) Prohibit visually detectable water in the solvent exiting the water separator.

(13) Provide the degreaser with a permanent, conspicuous label that lists the operating requirements in subdivisions (2) through (12).

(b) Ensure that the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with the following switches:

   (A) A condenser flow switch and thermostat that shuts off sump heat if condenser coolant stops circulating or becomes too warm.

   (B) A spray safety switch that shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).

(2) Equip the degreaser with one (1) of the following control devices:

   (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powdered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

   (B) A refrigerated chiller.

   (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.

   (D) A carbon adsorption system with ventilation that, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute (fifty (50) cubic feet per minute per square foot) of air-to-vapor interface area and an average of less than twenty-five (25) parts
per million of solvent is exhausted over one (1) complete adsorption cycle.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(3) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

(4) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety Health Administration requirements.

(5) Ensure that the label required under subsection (a)(13) includes the additional operating requirements listed in subdivisions (3) and (4).

SECTION E.1 NESHAP

Emissions Unit Description:

Coating Operation:

*****

(d) Vertical chain-on-edge adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:

(1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22

(2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22

(3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB7 and PB8 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB7 and PB8 are considered affected facilities.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB11 (Station 121), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.
Under 40 CFR Part 63, Subpart MMMM, PB11 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB11 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) roll coater adhesive application system, identified as RC1 (Station 124), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, RC1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, RC1 is considered an affected facility.

(j) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.
(k) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, SMDIP is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, SMDIP is considered an affected facility.

(k) One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

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

*****

SECTION E.2 NESHAP

Emissions Unit Description:

Coating Operation:

*****

(d) Vertical chain-on-edge adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:

1. One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to Stack S22.

2. One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to Stack S22.

3. Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to Stack S22.

Under 40 CFR Part 63, Subpart MMMM, PB7 and PB8 are considered affected facilities.
Under 40 CFR Part 63, Subpart PPPP, PB7 and PB8 are considered affected facilities.

(d) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to Stack S24.

Under 40 CFR Part 63, Subpart MMMM, PB10 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB10 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB11 (Station 121), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

Under 40 CFR Part 63, Subpart MMMM, PB11 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB11 is considered an affected facility.

(e) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S22.
Under 40 CFR Part 63, Subpart MMMM, PB12 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB12 is considered an affected facility.

(f) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, PB13 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB13 is considered an affected facility.

(g) One (1) primer application booth, identified as PB20 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB20) for particulate control, and exhausting to Stack S26.

Under 40 CFR Part 63, Subpart MMMM, PB20 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB20 is considered an affected facility.

(h) One (1) adhesive application booth, identified as PB21 (Station 121), approved in 2021 for construction, equipped with HVLP spray applicators, with a maximum capacity of 200 metal, plastic, or rubber parts per hour, using a dry filter (CPB21) for particulate control, and exhausting to Stack S27.

Under 40 CFR Part 63, Subpart MMMM, PB21 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB21 is considered an affected facility.

(i) One (1) dip and spin coating line, identified as PB22 (Station 116), approved in 2021 for construction, with a maximum capacity of 6,000 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, PB22 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, PB22 is considered an affected facility.

(j) One (1) roll coater adhesive application system, identified as RC1 (Station 124), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to Stack S18.

Under 40 CFR Part 63, Subpart MMMM, RC1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, RC1 is considered an affected facility.

(k) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

Under 40 CFR Part 63, Subpart MMMM, DIP1 is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, DIP1 is considered an affected facility.

(l) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

Under 40 CFR Part 63, Subpart MMMM, SMDIP is considered an affected facility.
Under 40 CFR Part 63, Subpart PPPP, SMDIP is considered an affected facility.
One (1) adhesive coating cell booth, identified as TSA1 (Station 125), installed in 2017, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, and consisting of the following:

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

SECTION E.5 NESHAP

**Emissions-Unit-Description:**

Miscellaneous:

(w) One (1) vapor degreaser, identified as VDG1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S1.

Under 40 CFR Part 63, Subpart T, VDG1 is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

[326 IAC 2-7-5(1)]


(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.5.2 Halogenated Solvent Cleaning NESHAP [40 CFR Part 63, Subpart T] [326 IAC 20-6]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart T (included as Attachment E to the operating permit), which are incorporated by reference as 326 IAC 20-6, for the emission unit listed above:

(1) 40 CFR 63.460(a), (b), (c)
(2) 40 CFR 63.461
(3) 40 CFR 63.463(a), (b)(2), (d), (e), (f)
(4) 40 CFR 63.464(a), (b), (c)
(5) 40 CFR 63.465(a), (b), (c), (d), (e)
(6) 40 CFR 63.466(a), (b), (c), (f), (g)
(7) 40 CFR 63.467(a), (b), (c)
(8) 40 CFR 63.468(f), (g), (h), (i)
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Surface coating (PB1 through PB6, PB8, PB10, PB12 through PB14, PB20 through PB22, RC1, DIP1, SMDIP, and TSA1), Banbury mixers (PMIX, NEMIX, SBMIX, R&D MIX), RPRCSS rubber making mills (PMILL, SMILL, NEMILL, R&D MILL)
Parameter: VOC emissions
Limit: Shall not exceed **246.00** 224 tons per twelve (12) consecutive month period

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

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 326 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Chain-on-edge #2 North, Station 130-1 (PB1)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 326 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Chain-on-edge #2 West, Station 130-2 (PB2)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12-Month Total (tons)</td>
<td></td>
</tr>
</tbody>
</table>

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**

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.  
Source Address: 326 West Monroe Street, Montpelier, Indiana 47359  
Part 70 Permit No.: T009-39987-00002  
Facility: Chain-on-edge #2 South, Station 130-3 (PB3)  
Parameter: VOC input  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12-Month Total (tons)</td>
<td></td>
</tr>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12-Month Total (tons)</td>
<td></td>
</tr>
</tbody>
</table>

☐ 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**

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359  
Part 70 Permit No.: T009-39987-00002  
Facility: Vertical chain-on-edge adhesive application booth (PB7) of Station 127  
Robotic adhesive application booth (PB21) of Station 121  
Parameter: VOC input  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 326 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Vertical chain-on-edge adhesive application booth (PB8) of Station 127
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12-Month Total (tons)</td>
<td></td>
</tr>
</tbody>
</table>

☐ 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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 326 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-39987-00002
Facility: Roll coater adhesive application system (RC1) (Station 124)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12-Month Total (tons)</td>
</tr>
</tbody>
</table>

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

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

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

IDEM, OAQ has made model updates to standard permit language in the Sections B of the permit to help clarify the intent of these requirements.

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

*****

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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 March 1, 2021.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 009-43813-00002. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 009-43940-00002.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification Significant Permit Modification be approved.
## IDEM Contact

(a) If you have any questions regarding this permit, please contact Hachem Ismaili Alaoui, 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) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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: [https://www.in.gov/idem/airpermit/public-participation/](https://www.in.gov/idem/airpermit/public-participation/); and the Citizens' Guide to IDEM on the Internet at: [https://www.in.gov/idem/resources/citizens-guide-to-idem/](https://www.in.gov/idem/resources/citizens-guide-to-idem/).
### Unlimited/Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chain-on-edge #2 North booth</td>
<td>PB1</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Chain-on-edge #2 West booth</td>
<td>PB2</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Chain-on-edge #2 South booth</td>
<td>PB3</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Chain-on-edge #1 West booth</td>
<td>PB4</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Chain-on-edge #1 South booth</td>
<td>PB5</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Chain-on-edge #1 East booth</td>
<td>PB14</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand spray booth</td>
<td>PB10</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB12</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>12.43</td>
<td>--</td>
<td>1.04</td>
<td>--</td>
</tr>
<tr>
<td>Robotic primer booth</td>
<td>PB20</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>--</td>
<td>--</td>
<td>12.51</td>
<td>--</td>
<td>0.06</td>
<td>MBK</td>
</tr>
<tr>
<td>Robotic adhesive booth</td>
<td>PB21</td>
<td>15.06</td>
<td>15.06</td>
<td>15.06</td>
<td>--</td>
<td>--</td>
<td>80.36</td>
<td>--</td>
<td>14.69</td>
<td>Xylene</td>
</tr>
<tr>
<td>Dip and spin station</td>
<td>PB22</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>8.57</td>
<td>--</td>
<td>0.72</td>
<td>Methanol</td>
</tr>
<tr>
<td>Booth Gun Cleaning Solvent</td>
<td></td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.82</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Gasket dip coating line</td>
<td>DIP1</td>
<td>4.57</td>
<td>4.57</td>
<td>4.57</td>
<td>--</td>
<td>--</td>
<td>23.43</td>
<td>--</td>
<td>3.14</td>
<td>Xylene</td>
</tr>
<tr>
<td>Adhesive coating cell booth</td>
<td>TSA1</td>
<td>4.57</td>
<td>4.57</td>
<td>4.57</td>
<td>--</td>
<td>--</td>
<td>23.43</td>
<td>--</td>
<td>3.14</td>
<td>Xylene</td>
</tr>
<tr>
<td>Primary Banbury mixer</td>
<td>PMIX</td>
<td>13.80</td>
<td>13.80</td>
<td>13.80</td>
<td>--</td>
<td>--</td>
<td>4.46</td>
<td>--</td>
<td>1.84</td>
<td>Carbon Disulfide</td>
</tr>
<tr>
<td>Primary mill</td>
<td>PMILL</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.73</td>
<td>--</td>
<td>0.32</td>
<td>Isophorone</td>
</tr>
<tr>
<td>Secondary mill</td>
<td>SMILL</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.49</td>
<td>--</td>
<td>0.00</td>
<td>Isophorone</td>
</tr>
<tr>
<td>NE Banbury mixer</td>
<td>NEIMIX</td>
<td>14.98</td>
<td>14.98</td>
<td>14.98</td>
<td>--</td>
<td>--</td>
<td>4.84</td>
<td>--</td>
<td>2.00</td>
<td>Carbon Disulfide</td>
</tr>
<tr>
<td>NE mill</td>
<td>NEILL</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.88</td>
<td>--</td>
<td>0.34</td>
<td>Carbon Disulfide</td>
</tr>
<tr>
<td>Small batch mixer</td>
<td>SBMIX</td>
<td>0.12</td>
<td>0.12</td>
<td>0.12</td>
<td>--</td>
<td>--</td>
<td>0.10</td>
<td>--</td>
<td>0.04</td>
<td>Carbon Disulfide</td>
</tr>
<tr>
<td>R&amp;D Banbury mixer</td>
<td>RDMIX</td>
<td>0.02</td>
<td>0.02</td>
<td>0.02</td>
<td>--</td>
<td>--</td>
<td>0.01</td>
<td>--</td>
<td>3.2E-03</td>
<td>Carbon Disulfide</td>
</tr>
<tr>
<td>R&amp;D mill</td>
<td>RDMILL</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>3.0E-03</td>
<td>--</td>
<td>5.4E-04</td>
<td>Isophorone</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 1a</td>
<td>109.81</td>
<td>109.81</td>
<td>109.81</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 10</td>
<td>109.81</td>
<td>109.81</td>
<td>109.81</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 2</td>
<td>214.44</td>
<td>184.42</td>
<td>184.42</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 3</td>
<td>101.30</td>
<td>70.91</td>
<td>70.91</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 4</td>
<td>33.77</td>
<td>23.64</td>
<td>23.64</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 5</td>
<td>33.77</td>
<td>23.64</td>
<td>23.64</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 6</td>
<td>7.82</td>
<td>7.82</td>
<td>7.82</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Grit blasting cabinet</td>
<td>Blaster 7</td>
<td>19.78</td>
<td>20.85</td>
<td>20.85</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Natural gas boiler</td>
<td>BLR3</td>
<td>0.07</td>
<td>0.28</td>
<td>0.28</td>
<td>0.02</td>
<td>3.65</td>
<td>0.20</td>
<td>3.07</td>
<td>0.13</td>
<td>Hexane</td>
</tr>
<tr>
<td>Flammable storage</td>
<td>FSTOR</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.68</td>
<td>--</td>
<td>1.68</td>
<td>Hexane</td>
<td></td>
</tr>
<tr>
<td>Parts washer</td>
<td>PW1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #1</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Manual phosphate line</td>
<td>PHOSLINE #2</td>
<td>3.35</td>
<td>3.35</td>
<td>3.35</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.56</td>
<td>HCI</td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #3</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Chlorination tank</td>
<td>N/A</td>
<td>0.50</td>
<td>0.50</td>
<td>0.50</td>
<td>--</td>
<td>--</td>
<td>0.02</td>
<td>--</td>
<td>0.02</td>
<td>HCI</td>
</tr>
</tbody>
</table>

**Total PTE:** 719.18 629.46 629.46 0.06 9.96 275.31 8.37 37.00 15.87 Xylene

*PM2.5 listed is direct PM2.5
## Appendix A: Emissions Calculations

**Source Summary: Limited PTE**

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

### Emission Unit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^*$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chain-on-edge #2 North booth</td>
<td>PB1</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Chain-on-edge #2 West booth</td>
<td>PB2</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Chain-on-edge #2 South booth</td>
<td>PB3</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Chain-on-edge #1 West booth</td>
<td>PB4</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Chain-on-edge #1 South booth</td>
<td>PB5</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Chain-on-edge #1 East booth</td>
<td>PB14</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB6</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Hand spray booth</td>
<td>PB10</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB12</td>
<td>1.39</td>
<td>1.39</td>
<td>1.39</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.04</td>
<td>Xylene</td>
</tr>
<tr>
<td>Robotic primer booth</td>
<td>PB20</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.06</td>
<td>MIBK</td>
</tr>
<tr>
<td>Robotic adhesive booth</td>
<td>PB21</td>
<td>15.06</td>
<td>15.06</td>
<td>15.06</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>14.69</td>
<td>11.71</td>
</tr>
<tr>
<td>Dip and spin station</td>
<td>PB22</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.72</td>
<td>0.70</td>
</tr>
<tr>
<td>Booth Gun Cleaning Solvent</td>
<td>PB6</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Adhesive coating cell booth</td>
<td>PB14</td>
<td>4.57</td>
<td>4.57</td>
<td>4.57</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>3.14</td>
<td>2.48</td>
</tr>
<tr>
<td>Primary Banbury mixer</td>
<td>PB14</td>
<td>13.80</td>
<td>13.80</td>
<td>13.80</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.84</td>
<td>1.57</td>
</tr>
<tr>
<td>Primary mill</td>
<td>PB14</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.32</td>
<td>0.17</td>
</tr>
<tr>
<td>Secondary mill</td>
<td>PB14</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.09</td>
<td>0.05</td>
</tr>
<tr>
<td>NE Banbury mixer</td>
<td>PB14</td>
<td>14.98</td>
<td>14.98</td>
<td>14.98</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>2.00</td>
<td>1.71</td>
</tr>
<tr>
<td>NE mill</td>
<td>PB14</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.34</td>
<td>0.19</td>
</tr>
<tr>
<td>Small batch mixer</td>
<td>PB14</td>
<td>0.12</td>
<td>0.12</td>
<td>0.12</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.04</td>
<td>0.03</td>
</tr>
<tr>
<td>R&amp;D Banbury mixer</td>
<td>PB14</td>
<td>0.02</td>
<td>0.02</td>
<td>0.02</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>3.2E-03</td>
<td>0.003</td>
</tr>
<tr>
<td>R&amp;D mill</td>
<td>PB14</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>5.4E-04</td>
<td>0.0003</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 1a</td>
<td>15.66</td>
<td>15.66</td>
<td>15.66</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 10</td>
<td>10.35</td>
<td>10.35</td>
<td>10.35</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 2</td>
<td>62.02</td>
<td>62.02</td>
<td>62.02</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 3</td>
<td>21.75</td>
<td>21.75</td>
<td>21.75</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 4</td>
<td>10.13</td>
<td>10.13</td>
<td>10.13</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 5</td>
<td>10.29</td>
<td>10.29</td>
<td>10.29</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 6</td>
<td>7.82</td>
<td>7.82</td>
<td>7.82</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grit blasting cabinet</td>
<td>Blaster 7</td>
<td>15.78</td>
<td>15.78</td>
<td>15.78</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Natural gas boiler</td>
<td>BLR3</td>
<td>0.07</td>
<td>0.28</td>
<td>0.28</td>
<td>0.02</td>
<td>0.20</td>
<td>0.13</td>
<td>0.07</td>
<td>Hexane</td>
<td>--</td>
</tr>
<tr>
<td>Natural gas boiler</td>
<td>BLR4</td>
<td>0.12</td>
<td>0.48</td>
<td>0.48</td>
<td>0.04</td>
<td>0.35</td>
<td>0.23</td>
<td>0.11</td>
<td>Hexane</td>
<td>--</td>
</tr>
<tr>
<td>Flammable storage</td>
<td>FSTOR</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.68</td>
<td>1.68</td>
<td>1.68</td>
<td>Xylene</td>
<td>--</td>
</tr>
<tr>
<td>Parts washer</td>
<td>PW1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.00</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Rubber coating operation</td>
<td>ROAT</td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Self-contained sand blaster</td>
<td>SBLAST</td>
<td>2.24</td>
<td>1.57</td>
<td>1.57</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Carbon silos</td>
<td>CSIL0</td>
<td>0.85</td>
<td>0.85</td>
<td>0.85</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #1</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #2</td>
<td>3.35</td>
<td>3.35</td>
<td>3.35</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.56</td>
<td>0.56</td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #3</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>Chlorination tank</td>
<td>N/A</td>
<td>0.50</td>
<td>0.50</td>
<td>0.50</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total PTE After Issuance:</strong></td>
<td></td>
<td>247.07</td>
<td>238.03</td>
<td>238.03</td>
<td>0.06</td>
<td>9.96</td>
<td>248.23</td>
<td>8.37</td>
<td>37.00</td>
<td>15.87 Xylene</td>
</tr>
</tbody>
</table>

PM$_{2.5}$ listed is direct PM$_{2.5}$.

*Note: The shaded cells indicate where limits are included.*

1 VOC emissions are limited to render the requirements of 326 IAC 2-2 (PSD) not applicable.

2 PM, PM$_{10}$, and PM$_{2.5}$ emissions are limited to render the requirements of 326 IAC 2-2 (PSD) not applicable.
# Significant Source Modification Summary

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismail Ali Alaoui  

## Emission Unit Summary

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robotic primer booth</td>
<td>PB20</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>--</td>
<td>--</td>
<td>12.51</td>
<td>--</td>
<td>0.06</td>
<td>MIBK</td>
</tr>
<tr>
<td>Robotic adhesive booth</td>
<td>PB21</td>
<td>15.06</td>
<td>15.06</td>
<td>15.06</td>
<td>--</td>
<td>--</td>
<td>80.36</td>
<td>--</td>
<td>14.69</td>
<td>Xylene</td>
</tr>
<tr>
<td>Dip and spin coating line</td>
<td>PB22</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>8.57</td>
<td>--</td>
<td>0.72</td>
<td>Methanol</td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 10</td>
<td>109.81</td>
<td>109.81</td>
<td>109.81</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #3</td>
<td>2.89</td>
<td>2.89</td>
<td>2.89</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>130.46</td>
<td>130.46</td>
<td>130.46</td>
<td>--</td>
<td>--</td>
<td>101.44</td>
<td>--</td>
<td>15.47</td>
<td>Xylene</td>
</tr>
<tr>
<td>Emission Unit ID</td>
<td>Xylene</td>
<td>Toluene</td>
<td>Ethylbenzene</td>
<td>Trichloroethylene</td>
<td>Methyl isobutyl ketone</td>
<td>Methanol</td>
<td>Formaldehyde</td>
<td>HCl</td>
<td>Carbon Disulfide</td>
<td>Isophorone</td>
</tr>
<tr>
<td>-----------------</td>
<td>--------</td>
<td>---------</td>
<td>--------------</td>
<td>------------------</td>
<td>------------------------</td>
<td>---------</td>
<td>-------------</td>
<td>-----</td>
<td>----------------</td>
<td>------------</td>
</tr>
<tr>
<td>Chain-on-edge #2 North booth</td>
<td>PB1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chain-on-edge #2 West booth</td>
<td>PB2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chain-on-edge #2 South booth</td>
<td>PB3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chain-on-edge #1 West booth</td>
<td>PB4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chain-on-edge #1 South booth</td>
<td>PB5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chain-on-edge #1 East booth</td>
<td>PB14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hand spray booth</td>
<td>PB10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adhesive application booth</td>
<td>PB13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primer Coating Cell Booth (Primer only)</td>
<td>TSA1</td>
<td>2.48</td>
<td>2.4E-02</td>
<td>0.58</td>
<td>7.3E-03</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adhesive Coating Cell Booth (Adhesive only)</td>
<td>TSA1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robotic primer booth</td>
<td>PB20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robotic adhesive booth</td>
<td>PB21</td>
<td>11.71</td>
<td>0.11</td>
<td>2.76</td>
<td>3.4E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Up and spin station</td>
<td>PB22</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gasket dip coating line</td>
<td>DIP1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary Banbury mixer</td>
<td>PBMIX</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary mill</td>
<td>PMILL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Secondary mill</td>
<td>SMILL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NE Banbury Mixer</td>
<td>NBMIX</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NE mill</td>
<td>NEMILL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Small batch mixer</td>
<td>SBMIX</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R&amp;D Banbury Mixer</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R&amp;D mill</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 1a</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 1d</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grit blaster</td>
<td>Blaster 6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Steel shot blaster</td>
<td>Blaster 8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grit Blasting Cabinet</td>
<td>Blaster 7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural gas boiler</td>
<td>BLR3</td>
<td>1.2E-04</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural gas boiler</td>
<td>BLR4</td>
<td>2.1E-04</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flammable storage</td>
<td>FSTOR</td>
<td>1.68</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parts washer</td>
<td>PW1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rubber coating operation</td>
<td>ROCOAT</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Self-coated sand blaster</td>
<td>SBBLAST</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbon silos</td>
<td>CSIL0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manual phosphate line</td>
<td>PHOSLINE #2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Automatic phosphate line</td>
<td>PHOSLINE #3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chlorination tank</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>15.87</td>
<td>0.14</td>
<td>3.35</td>
<td>0.04</td>
<td>0.00</td>
<td>0.47</td>
<td>11.73</td>
<td>0.01</td>
<td>0.58</td>
<td>3.32</td>
</tr>
</tbody>
</table>

1 An emission factor for Total HAPs was used for calculating emissions from the rubber compounds used in the mixers and mills in addition to the individual HAPs. The Total HAPs column is based on the combined emission factor for the mixers and mills rather than a sum of the individual HAPs.
Roll and dip coating has 100% transfer efficiency and no potential particulate emissions. It was conservatively assumed that coating usage rate decreased the previous usage rates by half. These paint booths have switched from high pressure sprayers to “Turbospray” HVLP, which increased transfer efficiency to 75%. These calculations are based on additional information provided by the source on August 8, 2013.

Notes:
- These calculations are based on additional information provided by the source on August 8, 2013.
- These paint booths have switched from high pressure sprayers to “Turbospray” HVLP, which increased transfer efficiency to 75%.
- It was conservatively assumed that coating usage rate decreased the previous usage rates by half.
- Roll and dip coating has 100% transfer efficiency and no potential particulate emissions.
- PM=PTE of HAP+PTE of PM

Methodology:
Usage (gal/day) = (Usage rate of coating (gal/hr) + Usage rate of solvent (gal/hr)) * 24 hrs/day
PTE of VOC (lb/hr) = Σ (Maximum usage (gal/hr) * VOC content (lb/gal coating)) (total for coating + solvent, if applicable)
PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
PTE of VOC (ton/yr) = PTE of VOC (lb/day) / 2000 lbs
PTE of PM (ton/yr) = Maximum usage (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs (for coating as solvents have no solids)
PTE of HAP (ton/yr) = Σ (Maximum usage (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr) * 1 ton/2000 lbs (total for coating + solvent, if applicable)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Transfer Efficiency</th>
<th>Maximum throughput (gal/hr)</th>
<th>Usage rate (gal/part)</th>
<th>Maximum usage (gal/day)</th>
<th>Usage (gal/day)</th>
<th>PTE of VOC (lb/hr)</th>
<th>PTE of VOC (lb/day)</th>
<th>PTE of VOC (ton/yr)</th>
<th>PTE of PM (ton/yr)</th>
<th>Xylene</th>
<th>Toluen</th>
<th>Ethyl benzene</th>
<th>1,1,2-Trichloroethane</th>
<th>Methyl isobutyl ketone</th>
<th>Methanol</th>
<th>Formaldehyde</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chain-on-edge #2 North (Primer or Adhesive)</td>
<td>PB1</td>
<td>75%</td>
<td>2000</td>
<td>0.000218</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
</tr>
<tr>
<td>Chain-on-edge #2 West (Primer or Adhesive)</td>
<td>PB2</td>
<td>75%</td>
<td>2000</td>
<td>0.000218</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
</tr>
<tr>
<td>Chain-on-edge #2 South (Primer or Adhesive)</td>
<td>PB3</td>
<td>75%</td>
<td>2000</td>
<td>0.000218</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
</tr>
<tr>
<td>Chain-on-edge #1 West (Primer or Adhesive)</td>
<td>PB4</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Chain-on-edge #1 South (Primer or Adhesive)</td>
<td>PB5</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Chain-on-edge #1 East (Primer or Adhesive)</td>
<td>PB14</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Adhesive application booth (Primer or Adhesive)</td>
<td>PB6</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Hand spray booth (Primer or Adhesive)</td>
<td>PB10</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Adhesive application booth (Primer or Adhesive)</td>
<td>PB12</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Adhesive application booth (Primer or Adhesive)</td>
<td>PB13</td>
<td>75%</td>
<td>2000</td>
<td>0.44</td>
<td>10.44</td>
<td>2.84</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
<td>1.04</td>
</tr>
<tr>
<td>Robotic primer application booth (Primer)</td>
<td>PB20</td>
<td>75%</td>
<td>200</td>
<td>0.004234</td>
<td>0.85</td>
<td>20.33</td>
<td>2.86</td>
<td>68.11</td>
<td>12.43</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>1.008</td>
<td>0.001</td>
</tr>
<tr>
<td>Robotic adhesive application booth (Adhesive)</td>
<td>PB21</td>
<td>75%</td>
<td>200</td>
<td>0.023442</td>
<td>4.72</td>
<td>113.48</td>
<td>18.35</td>
<td>440.31</td>
<td>80.36</td>
<td>15.06</td>
<td>11.71</td>
<td>0.11</td>
<td>2.76</td>
<td>0.034</td>
<td>-</td>
<td>0.007</td>
<td>-</td>
<td>14.69</td>
</tr>
<tr>
<td>Dia and spin coating line (Primer or Adhesive)</td>
<td>PB22</td>
<td>100%</td>
<td>6000</td>
<td>0.30</td>
<td>7.20</td>
<td>1.96</td>
<td>46.97</td>
<td>8.57</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.022</td>
<td>0.695</td>
<td>0.0004</td>
<td>0.72</td>
<td></td>
</tr>
<tr>
<td>Primer Coating Cell Booth (Primer only)</td>
<td>TSA1</td>
<td>75%</td>
<td>2000</td>
<td>0.000216</td>
<td>0.44</td>
<td>10.46</td>
<td>1.47</td>
<td>35.29</td>
<td>6.44</td>
<td>1.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.003</td>
<td>-</td>
<td>0.001</td>
</tr>
<tr>
<td>Adhesive Coating Cell Booth (Adhesive only)</td>
<td>TSA1</td>
<td>75%</td>
<td>2000</td>
<td>0.000500</td>
<td>1.00</td>
<td>24.00</td>
<td>3.88</td>
<td>93.12</td>
<td>16.99</td>
<td>3.18</td>
<td>2.48</td>
<td>0.02</td>
<td>0.68</td>
<td>0.01</td>
<td>-</td>
<td>0.015</td>
<td>-</td>
<td>3.11</td>
</tr>
<tr>
<td>Gasket dip coating line (Primer or Adhesive)</td>
<td>DP1</td>
<td>100%</td>
<td>1000</td>
<td>0.30</td>
<td>7.20</td>
<td>1.96</td>
<td>46.97</td>
<td>8.57</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.022</td>
<td>0.695</td>
<td>0.0004</td>
<td>0.72</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>11.96</td>
<td>287.07</td>
<td>58.85</td>
<td>1412.30</td>
<td>257.74</td>
<td>36.18</td>
<td>14.19</td>
<td>0.14</td>
<td>3.35</td>
<td>0.04</td>
<td>0.47</td>
<td>11.56</td>
<td>0.01</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
- These paint booths have switched from high pressure sprayers to “Turbospray” HVLP, which increased transfer efficiency to 75%.
- It was conservatively assumed that coating usage rate decreased the previous usage rates by half.
- Roll and dip coating has 100% transfer efficiency and no potential particulate emissions.
- PM=PTE of HAP+PTE of PM

*PTE of these units were calculated using the maximum usage (gal of coating/hr) as provided by the source, rather than the maximum throughput (parts/hr) and usage rate (gal/part)
Appendix A: Emissions Calculations
Worst-case coatings

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-33173-00002
Significant Permit Modification: 009-33180-00002
Reviewer: Hachem Ismaili Alaoui

### Worst-case coatings

**Company Name:** BRC Rubber & Plastics, Inc.

**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359

**Significant Source Modification:** 009-33173-00002

**Significant Permit Modification:** 009-33180-00002

**Reviewer:** Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (water, VOC, and exempt compounds)*</th>
<th>Weight % water and exempt compounds*</th>
<th>Weight % VOC</th>
<th>Volume % water and exempt compounds*</th>
<th>Volume % Solids</th>
<th>VOC content (lb/gal coating)</th>
<th>VOC content (lb/gal coating less water)</th>
<th>VOC content (lb/gal coating solids)</th>
<th>Solids content (% by weight) as applied</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primer Coat - Worst Case for VOC and HAP - only primer used</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemlok 207LH</td>
<td>7.60</td>
<td>80.32%</td>
<td>0.00%</td>
<td>80.32%</td>
<td>0.0%</td>
<td>9.99%</td>
<td>6.10</td>
<td>3.37</td>
<td>12.0%</td>
<td></td>
</tr>
<tr>
<td>MPK Solvent - cleaner</td>
<td>0.78</td>
<td>100.0%</td>
<td>19.9%</td>
<td>80.50%</td>
<td>15.8%</td>
<td>0.00%</td>
<td>5.44</td>
<td>6.46</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Adhesive Coat - Worst Case for VOC and HAP</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemlok 8190</td>
<td>6.65</td>
<td>94.65%</td>
<td>3.49%</td>
<td>91.20%</td>
<td>2.76%</td>
<td>3.85%</td>
<td>6.07</td>
<td>6.52</td>
<td>1.35%</td>
<td></td>
</tr>
<tr>
<td>MPK Solvent - cleaner</td>
<td>0.79</td>
<td>100.0%</td>
<td>0.00%</td>
<td>100.0%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Adhesive Coat - Worst Case for HAPs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemlok 407</td>
<td>6.81</td>
<td>89.34%</td>
<td>8.81%</td>
<td>80.53%</td>
<td>7.32%</td>
<td>8.20%</td>
<td>5.48</td>
<td>6.21</td>
<td>0.2%</td>
<td></td>
</tr>
<tr>
<td>MPK Solvent - cleaner</td>
<td>0.76</td>
<td>100.0%</td>
<td>19.9%</td>
<td>80.50%</td>
<td>15.8%</td>
<td>0.0%</td>
<td>5.44</td>
<td>6.46</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Adhesive Coat - Worst Case for Solvents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TyPly</td>
<td>7.06</td>
<td>63.00%</td>
<td>8.66%</td>
<td>54.34%</td>
<td>8.40%</td>
<td>13.68%</td>
<td>37.00</td>
<td>4.79</td>
<td>37.00%</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
These numbers are provided by the source. They are based on Air Quality Data Sheets and paints and solvents mixing ratios used in the surface coating primer and adhesive booths.

MPK = Methyl n-Propyl Ketone - VOC but non-HAP
TBA = tert butyl acetate, which is an exempt VOC pursuant to 40 CFR 51.100.
Cleaning emissions are 2% by weight of usage.

**Density (column B), VOC content (Column I), Solids content (Column J) and HAPs (columns K-Q) are "as applied" for primers and adhesives.

**Methodology:**
- Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or provided in MSDS
- Weight % Volatile (Water & VOC) (for lubricant) = 1 - Weight % solids (31%, as provided in MSDS)
- Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt
- Weight % VOC (for lubricant and ethanol) = VOC content (lb/gal coating) / Density (lb/gal)
- Weight % Water & Exempt (for lubricant and ethanol) = Weight % Volatile (Water & Organics) - Weight % VOC
- Volume % Water = Weight % Water / Density (lb/gal) / Density of water (8.34 lb/gal)
- Maximum usage (gal/hr) = Usage rate (gals/unit) / Maximum throughput (units/hr)
- VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
- VOC content (lb/gal coating for lubricant) = VOC content (lb/L, as provided in MSDS) * 1 kg/1000 g * 2.0462 lb/kg * 3.7854 L/gal
- VOC content (lb/gal coating less water) = Density (lb/gal) * Weight % VOC / (1 - Volume % Water)
- VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

**HAPS % by weight**

| Xylene | Toluene | Ethylbenzene | 1,1,2-Trichloroethane | Methyl isobutyl ketone (MIBK) | Formaldehyde | Methanol | Hexane | HCl |
|--------|---------|--------------|-----------------------|-------------------------------|-------------|----------|--------|-----|-----|
|        |         |              |                       |                               |             |          |        |     |     |
Appendix A: Emissions Calculations
Booth Guns Cleaning

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

Cleaning solvent quantities used in 2020 (lbs)

<table>
<thead>
<tr>
<th>Solvent</th>
<th>Pounds per year</th>
<th>% VOC</th>
<th>%HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>MEK</td>
<td>90.0</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>MPK</td>
<td>1,950.0</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>TBA</td>
<td>15,000.0</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Assume 2% emissions from cleaning

<table>
<thead>
<tr>
<th>Solvent</th>
<th>VOC Emissions (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MEK</td>
<td>1.8</td>
</tr>
<tr>
<td>MPK</td>
<td>39</td>
</tr>
<tr>
<td>TBA</td>
<td>300</td>
</tr>
</tbody>
</table>

Note:
TBA is a Non-VOC or HAP solvent
Appendix A: Emissions Calculations

Blasters 1a and 10

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Efficiency</th>
<th>Grain loading rate (grains/acf)</th>
<th>Air flow rate (acfm)</th>
<th>Uncontrolled PTE of PM (lb/hr)</th>
<th>Uncontrolled PTE of PM (ton/yr)</th>
<th>Controlled PTE of PM (lb/hr)</th>
<th>Controlled PTE of PM (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>99%</td>
<td>0.015</td>
<td>1950</td>
<td>25.1</td>
<td>109.8</td>
<td>0.251</td>
<td>1.10</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>99%</td>
<td>0.015</td>
<td>1950</td>
<td>25.1</td>
<td>109.8</td>
<td>0.251</td>
<td>1.10</td>
</tr>
</tbody>
</table>

Notes:
These calculations are derived from Appendix A to the TSD for SSM #009-30007-00002 and SPM #009-30098-00002
PM = PM10 = PM2.5

Methodology:
Controlled PTE of PM (lb/hr) = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains
Controlled PTE of PM (ton/yr) = Controlled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
Uncontrolled PTE = Controlled PTE / (1 - Control efficiency)

IAC 6-3-2 Limit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Material throughput (lb/hr)</th>
<th>Steel shot throughput (lb/hr)</th>
<th>Process weight rate (ton/hr)</th>
<th>Allowable emissions (lb/hr)</th>
<th>Control efficiency needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>1600</td>
<td>30</td>
<td>0.82</td>
<td>3.57</td>
<td>85.7%</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>1600</td>
<td>30</td>
<td>0.82</td>
<td>3.57</td>
<td>85.7%</td>
</tr>
</tbody>
</table>

Notes:
PSD limits cannot be greater than the limits to comply with 325 IAC 6-3-2.
For PSD limits, PM = PM10 = PM2.5

Methodology:
Process weight rate (ton/hr) = (Material throughput (lb/hr) + Steel shot throughput (lb/hr)) / 2000 lb/ton
Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)0.67, pursuant to 326 IAC 6-3-2(e)
Limited PTE (ton/yr) = Limited PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

IAC 2-2 (PSD) Limit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Limited PTE of PM (lb/hr)</th>
<th>Limited PTE of PM (ton/yr)</th>
<th>Control efficiency needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 1a</td>
<td>3.57</td>
<td>15.66</td>
<td>85.7%</td>
</tr>
<tr>
<td>Blaster 10</td>
<td>2.50</td>
<td>10.95</td>
<td>90.0%</td>
</tr>
</tbody>
</table>
**Table 1 - Emission Factors for Abrasives**

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM/lb abrasive</th>
<th>lb PM_{10}/lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>0.70</td>
</tr>
</tbody>
</table>

**Table 2 - Density of Abrasives (lb/ft³)**

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
</tbody>
</table>

**Table 3 - Sand Flow Rate Through Nozzle (lb/hr)**

Flow rate of sand through a blasting nozzle as a function of nozzle pressure and internal diameter.

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>ID (in)</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 (1/16 inch)</td>
<td>0.125</td>
<td>28</td>
<td>35</td>
<td>42</td>
<td>49</td>
<td>55</td>
<td>63</td>
<td>70</td>
<td>77</td>
</tr>
<tr>
<td>No. 3 (3/16 inch)</td>
<td>0.1785</td>
<td>65</td>
<td>80</td>
<td>94</td>
<td>107</td>
<td>122</td>
<td>135</td>
<td>149</td>
<td>165</td>
</tr>
<tr>
<td>No. 4 (1/4 inch)</td>
<td>0.25</td>
<td>109</td>
<td>138</td>
<td>168</td>
<td>195</td>
<td>221</td>
<td>255</td>
<td>280</td>
<td>309</td>
</tr>
<tr>
<td>No. 5 (5/32 inch)</td>
<td>0.3125</td>
<td>207</td>
<td>247</td>
<td>292</td>
<td>345</td>
<td>377</td>
<td>420</td>
<td>462</td>
<td>507</td>
</tr>
<tr>
<td>No. 6 (3/32 inch)</td>
<td>0.375</td>
<td>285</td>
<td>355</td>
<td>417</td>
<td>477</td>
<td>540</td>
<td>600</td>
<td>657</td>
<td>720</td>
</tr>
<tr>
<td>No. 7 (7/32 inch)</td>
<td>0.4375</td>
<td>385</td>
<td>472</td>
<td>569</td>
<td>645</td>
<td>755</td>
<td>820</td>
<td>905</td>
<td>940</td>
</tr>
<tr>
<td>No. 8 (1/4 inch)</td>
<td>0.5</td>
<td>503</td>
<td>615</td>
<td>725</td>
<td>835</td>
<td>945</td>
<td>1050</td>
<td>1160</td>
<td>1265</td>
</tr>
<tr>
<td>No. 10 (5/32 inch)</td>
<td>0.625</td>
<td>820</td>
<td>990</td>
<td>1170</td>
<td>1336</td>
<td>1510</td>
<td>1680</td>
<td>1850</td>
<td>2030</td>
</tr>
<tr>
<td>No. 12 (3/4 inch)</td>
<td>0.75</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
<td>1915</td>
<td>2160</td>
<td>2400</td>
<td>2630</td>
<td>2880</td>
</tr>
<tr>
<td>No. 16 (1 inch)</td>
<td>1</td>
<td>2030</td>
<td>2450</td>
<td>2950</td>
<td>3440</td>
<td>3780</td>
<td>4200</td>
<td>4540</td>
<td>5000</td>
</tr>
</tbody>
</table>

**Uncontrolled PTE - PM**

**Controlled PTE - PM**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Number of nozzles</th>
<th>Fraction of time of wet blasting</th>
<th>Flow rate (lb/hr)</th>
<th>PM (lb/lb abrasive)</th>
<th>PM_{10} (lb/lb PM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 2</td>
<td>1</td>
<td>0%</td>
<td>12240.0</td>
<td>0.004</td>
<td>0.88</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>99</td>
<td>0.375</td>
<td>477</td>
<td>0.375</td>
<td>160</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>99</td>
<td>0.375</td>
<td>477</td>
<td>0.375</td>
<td>160</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>99</td>
<td>0.375</td>
<td>477</td>
<td>0.375</td>
<td>160</td>
</tr>
</tbody>
</table>

**Controlled PTE**

**Controlled PTE - PM**

**Controlled PTE - PM_{10}**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Efficiency</th>
<th>PM_{10} (lb/lb PM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 2</td>
<td>99%</td>
<td>2.14</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>99%</td>
<td>1.01</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>99%</td>
<td>0.85</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>99%</td>
<td>0.72</td>
</tr>
</tbody>
</table>

**Adjusted Flow Rates for Steel Shot**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Density of sand (lb/ft³) (Table 2)</th>
<th>ID of sandblasting nozzle (ID of actual nozzle)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 2</td>
<td>99</td>
<td>0.375</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>24</td>
<td>0.375</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>24</td>
<td>0.375</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>24</td>
<td>0.375</td>
</tr>
</tbody>
</table>

**Notes:**
- These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002) and additional information provided by the source on August 8, 2013.
- ID = internal diameter of nozzle.
- Flow rate of Blaster 2 based on manufacturer's specifications of 17 lbs of steel shot per 5 seconds.
- Blasters 3, 4, and 5 use aluminum oxide as abrasive.
- Calculations for Blaster 4 are derived from Appendix A to the TSD for SSM #009-19573-00002 and SPM #009-19963-00002, then identified as Ruemblin Hand Blaster Emission factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition).

**Methodology:**

Flow rate of Al oxide (lb/hr) = Sand flow rate (lb/hr) * (ID of sandblasting nozzle / ID of actual nozzle)² * (Density of Al oxide / Density of sand)

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb abrasive) * (1 - Fraction of time of wet blasting/200) * Number of nozzles

Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr

Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

**Table 1 - Emission Unit**

<table>
<thead>
<tr>
<th>Material throughput (lb/hr)</th>
<th>Abrasive throughput (lb/hr)</th>
<th>Process weight rate (ton/hr)</th>
<th>Allowable emissions (lb/hr)</th>
<th>Control efficiency needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 2</td>
<td>477.3</td>
<td>12240.0</td>
<td>14.18</td>
<td>71.1%</td>
</tr>
<tr>
<td>Blaster 3</td>
<td>350</td>
<td>2312.7</td>
<td>1.33</td>
<td>97.8%</td>
</tr>
<tr>
<td>Blaster 4</td>
<td>80</td>
<td>770.9</td>
<td>0.43</td>
<td>92.7%</td>
</tr>
<tr>
<td>Blaster 5</td>
<td>100</td>
<td>770.9</td>
<td>0.44</td>
<td>92.7%</td>
</tr>
</tbody>
</table>

**Notes:**
- PSD limits cannot be greater than the limits to comply with 325 IAC 6-3-3.
- For PSD limits, PM = PM_{10} = PM_{2.5}

**Methodology:**

Abrasive throughput (lb/hr) = Flow rate (lb/hr) * Number of nozzles

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Abrasive throughput (lb/hr)) / 2000 lb/ton

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)²/3, pursuant to 326 IAC 6-3-2(e)

Limited PTE (ton/yr) = Limited PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))
Appendix A: Emissions Calculations
Blaster 6

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Particulate collected (lb/wk)</th>
<th>Normal operating hours (hr/wk)</th>
<th>Particulate collection rate (lb/hr)</th>
<th>Control efficiency</th>
<th>Uncontrolled PTE of PM (lb/hr)</th>
<th>Uncontrolled PTE of PM (ton/yr)</th>
<th>Controlled PTE of PM (lb/hr)</th>
<th>Controlled PTE of PM (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>175</td>
<td>100</td>
<td>1.75</td>
<td>98.0%</td>
<td>1.79</td>
<td>7.82</td>
<td>0.036</td>
<td>0.156</td>
</tr>
</tbody>
</table>

Notes:
These calculations are derived from Appendix A to the TSD for SSM #009-30007-00002 and SPM #009-30098-00002
PM=PM_{10}=PM_{2.5}

Methodology:
Particulate collection rate (lb/hr) = Particulate collected (lb/wk) / Normal operating hours (hr/wk)
Uncontrolled PTE (lb/hr) = Particulate collection rate (lb/hr) / Control efficiency
Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

IAC 6-3-2 Limit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Total throughput (lb/hr)</th>
<th>Process weight rate (ton/hr)</th>
<th>Allowable emissions (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaster 6</td>
<td>2142.9</td>
<td>1.07</td>
<td>4.29</td>
</tr>
</tbody>
</table>

Notes:
Total throughput (lb/hr) based on 250 lbs. max load and minimum load time of 7 minutes.
This throughput is for both steel shot and parts being blasted.

Methodology:
Process weight rate (ton/hr) = Total throughput (lb/hr) / 2000 lb/ton
Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)
Appendix A: Emission Calculations
Grit Blasting Cabinet

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

\[ \text{FR} = \text{Flow rate of actual abrasive (lb/hr)} = 170.00 \text{ lb/hr (per nozzle)} \]
\[ w = \text{fraction of time of wet blasting} = 0 \% \]
\[ N = \text{number of nozzles} = 4 \]
\[ \text{EF} = \text{PM emission factor for actual abrasive from Table 1} = 0.010 \text{ lb PM/lb abrasive} \]
\[ \text{PM10 emission factor ratio for actual abrasive from Table 1} = 0.70 \text{ lb PM10/lb PM} \]

\[ \begin{align*}
\text{PM} & \quad \text{PM10} & \quad \text{PM2.5} \\
6.80 & \quad 4.76 & \quad 4.76 \\
163.20 & \quad 114.24 & \quad 114.24 \\
29.78 & \quad 20.85 & \quad 20.85
\end{align*} \text{ lb/hr} \]
\[ \begin{align*}
\text{Potential to Emit (before control)} & = \text{PM} \times \text{PM10} \times \text{PM2.5} \\
& = 6.80 \times 4.76 \times 4.76 \text{ lb/day} \\
& = 163.20 \times 114.24 \times 114.24 \text{ ton/yr}
\end{align*} \]

Potential to Emit After Control

\[ \begin{align*}
\text{Emission Control Device Efficiency} & = 99.0\% \quad 99.0\% \quad 99.0\% \\
\text{Potential to Emit (after control)} & = \text{Potential to Emit (before control)} \times [1 - \text{control efficiency}] \\
& = 0.07 \times 0.05 \times 0.05 \text{ lb/hr} \\
& = 1.63 \times 1.14 \times 1.14 \text{ lb/day} \\
& = 0.30 \times 0.21 \times 0.21 \text{ ton/yr}
\end{align*} \]

Methodology
PM2.5 emissions assumed equal to PM10 emissions.
Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Appendix A: Emissions Calculations
Boilers (BLR3 and BLR4)

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Source Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission unit</th>
<th>Emission Unit ID</th>
<th>Number of Units</th>
<th>Heat Input Capacity Each (MMBtu/hr/unit)</th>
<th>Total Potential Throughput (MMCF/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>BLR3</td>
<td>1</td>
<td>8.50</td>
<td>73.0</td>
</tr>
<tr>
<td>Boiler</td>
<td>BLR4</td>
<td>1</td>
<td>14.70</td>
<td>126.2</td>
</tr>
<tr>
<td><strong>Totals:</strong></td>
<td></td>
<td></td>
<td><strong>23.200</strong></td>
<td><strong>126.2</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>Direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor (lb/MMCF)</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100.0</td>
<td>5.5</td>
<td>84.0</td>
</tr>
<tr>
<td>Potential Emission (tons/yr) (BLR3)</td>
<td>0.1</td>
<td>0.3</td>
<td>0.3</td>
<td>0.0</td>
<td>3.7</td>
<td>0.2</td>
<td>3.1</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr) (BLR4)</td>
<td>0.1</td>
<td>0.5</td>
<td>0.5</td>
<td>0.0</td>
<td>6.3</td>
<td>0.3</td>
<td>5.3</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor (lb/MMCF)</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
</tr>
<tr>
<td>Potential Emission (tons/yr) (BLR3)</td>
<td>7.665E-05</td>
<td>4.380E-05</td>
<td>2.738E-03</td>
<td>6.570E-02</td>
<td>1.241E-04</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr) (BLR4)</td>
<td>1.326E-04</td>
<td>7.575E-05</td>
<td>4.734E-03</td>
<td>0.11</td>
<td>2.146E-04</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor (lb/MMCF)</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>Potential Emission (tons/yr) (BLR3)</td>
<td>1.825E-05</td>
<td>4.015E-05</td>
<td>5.110E-05</td>
<td>1.387E-05</td>
<td>7.665E-05</td>
</tr>
<tr>
<td>Potential Emissions (tons/yr) (BLR4)</td>
<td>3.156E-05</td>
<td>6.944E-05</td>
<td>8.837E-05</td>
<td>2.399E-05</td>
<td>1.326E-04</td>
</tr>
</tbody>
</table>

Total HAPs (BLR3): 0.07
Total HAPs (BLR4): 0.12

Notes:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology:
Total Heat Input Capacity (MMBtu/hr) = \( \sum \) (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1.020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Volume dispensed (gal/day)</th>
<th>Volume dispensed (gal/hr)</th>
<th>Average density (lb/gal)</th>
<th>Max storage (gal)</th>
<th>Max throughput (gal/yr)</th>
<th>Mixing rate (gal/day)</th>
<th>Dispensing losses (lb/yr)</th>
<th>Standing losses (lb/yr)</th>
<th>Mixing losses (lb/yr)</th>
<th>PTE of VOC/xylene (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flammable Liquid Storage</td>
<td>FSTOR</td>
<td>60</td>
<td>10</td>
<td>8</td>
<td>3050</td>
<td>13000</td>
<td>550</td>
<td>1752</td>
<td>10.4</td>
<td>1606</td>
<td>1.68</td>
</tr>
</tbody>
</table>

Notes:
These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002).
Potential VOC emissions based on engineering judgment are from storage of 55 gallon drums.
Sealed drums of adhesives, solvents and all coatings are stored in FSTOR.
Drums being used (up to 10 at a time) are mixed continuously, but sealed.
Operating at 8 hr/day, 5-10 gallons of liquid are dispensed twice daily, which takes approximately 15 minutes.
Operating at 24 hr/day, 60 gallons of liquid are potentially dispensed per day.
All losses are assumed to be VOC and xylene, as a worst case.

Methodology:
Mixing rate (gal/day) = 10 drums/day * 55 gal/drum
Dispensing losses (lb/yr) = Volume dispensed (gal/day) * Assumed loss from dispensing * Average density (lb/gal) * 365 day/yr
Standing losses (lb/yr) = Max throughput (gal/yr) * Assumed loss from storage * Average density (lb/gal)
Mixing losses (lb/yr) = Mixing rate (gal/day) * Assumed loss from mixing * Average density (lb/gal) * 365 day/yr
PTE of VOC/xylene (ton/yr) = (Dispensing losses (lb/yr) + Standing losses (lb/yr) + Mixing losses (lb/yr)) / 2000 lb/ton
### Emission Calculations

**Parts Washer (PW1)**

- **Company Name:** BRC Rubber & Plastics, Inc.
- **Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359
- **Significant Source Modification:** 009-43813-00002
- **Significant Permit Modification:** 009-43940-00002
- **Reviewer:** Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Actual solvent usage (gal/day)</th>
<th>Operating hours (hr/day)</th>
<th>Solvent usage rate (gal/hr)</th>
<th>Density (lb/gal)</th>
<th>VOC/HAP Content (%)</th>
<th>PTE of VOC (lb/hr)</th>
<th>PTE of VOC (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parts Washer</td>
<td>PW1</td>
<td>3</td>
<td>8</td>
<td>0.375</td>
<td>6.76</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Notes:**
These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002).

Degreaser solvent is 100% tert-butyl acetate (TBA), a non-VOC and non-HAP

3 gallons of TBA is used per 8 hour shift.

**Methodology:**
Solvent usage rate (gal/hr) = Actual solvent usage (gal/day) / Operating hours (hr/day)
PTE of VOC (lb/hr) = Solvent usage rate (gal/hr) * Density (lb/hr)
PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

**Mixing and Milling**

**Company Name:** BRC Rubber & Plastics, Inc.

**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359

**Significant Source Modification:** 009-43813-00002

**Significant Permit Modification:** 009-43940-00002

**Reviewer:** Hachem Ismaili Alaoui

#### Notes:
- Emission factors from AP-42 Chapter 4, Section 12.
- Assume that 100% of rubber in the line is Compound #10 for worst-case of VOC and HAPs emissions from mixing.
- Assume that 100% of rubber in the line is Compound #3 for worst-case of VOC and HAPs from milling and PM emissions from mixing.
- Worst-case single HAP for mixing and milling is carbon disulfide and isophorone, respectively.

#### Methodology:
- \( PTE_{(lb/hr)} = \text{Maximum throughput (lb/hr)} \times \text{Emission factor (lb/lb)} \)
- \( PTE_{\text{controlled PM}} = PTE_{\text{controlled PM}} \times (1 - \text{Control efficiency}) \)
- \( PTE_{\text{ton/yr}} = PTE_{\text{lb/hr}} \times 8760 \text{ hrs/yr} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \)

#### 326 IAC 6-3-2 Limit

**Notes:**
- These units are all able to comply with 326 IAC 6-3-2 before control, therefore the baghouses are considered voluntary control.

#### Methodology:
- Process weight rate (ton/hr) = Total throughput (lb/hr) / 2000 lb/ton
- Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)\(^{0.67}\), pursuant to 326 IAC 6-3-2(e)

### Table:

<table>
<thead>
<tr>
<th>Line</th>
<th>Unit</th>
<th>Maximum capacity (lb/hr)</th>
<th>Control efficiency</th>
<th>Emission Factors (lb/lb)</th>
<th>PTE (lb/hr)</th>
<th>PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>VOC</td>
<td>Total HAPs</td>
<td>Carbon disulfide</td>
</tr>
<tr>
<td>Primary</td>
<td>PMIX</td>
<td>3500</td>
<td>99%</td>
<td>9.00E-04</td>
<td>2.91E-04</td>
<td>2.06E-05</td>
</tr>
<tr>
<td></td>
<td>PMILL</td>
<td>3500</td>
<td>N/A</td>
<td>1.13E-04</td>
<td>2.06E-05</td>
<td>9.12E-05</td>
</tr>
<tr>
<td></td>
<td>NEMIX</td>
<td>3800</td>
<td>99%</td>
<td>9.00E-04</td>
<td>2.91E-04</td>
<td>2.06E-05</td>
</tr>
<tr>
<td></td>
<td>NEMILL</td>
<td>3800</td>
<td>N/A</td>
<td>1.13E-04</td>
<td>2.06E-05</td>
<td>9.12E-05</td>
</tr>
<tr>
<td></td>
<td>R&amp;DMIX</td>
<td>6</td>
<td>99%</td>
<td>9.00E-04</td>
<td>2.91E-04</td>
<td>2.06E-05</td>
</tr>
<tr>
<td>Secondary</td>
<td>SBMIX</td>
<td>75</td>
<td>96%</td>
<td>3.58E-04</td>
<td>2.91E-04</td>
<td>1.20E-04</td>
</tr>
<tr>
<td></td>
<td>R&amp;D MILL</td>
<td>6</td>
<td>N/A</td>
<td>1.13E-04</td>
<td>2.06E-05</td>
<td>9.12E-05</td>
</tr>
</tbody>
</table>

#### Notes:
- These units are all able to comply with 326 IAC 6-3-2 before control, therefore the baghouses are considered voluntary control.

#### Methodology:
- Process weight rate (ton/hr) = Total throughput (lb/hr) / 2000 lb/ton
- Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)\(^{0.67}\), pursuant to 326 IAC 6-3-2(e)
### Appendix A: Emissions Calculations

**Rubber Coating (RCOAT)**

**Company Name:** BRC Rubber & Plastics, Inc.

**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359

**Significant Source Modification:** 009-43813-00002

**Significant Permit Modification:** 009-43940-00002

**Reviewer:** Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Rubber coating</td>
<td>RCOAT</td>
<td>220</td>
<td>150</td>
<td>1.467</td>
<td>0.676</td>
<td>0.791</td>
<td>16000</td>
<td>33600</td>
<td>49280</td>
<td>5%</td>
<td>0.66</td>
</tr>
</tbody>
</table>

**Notes:**

These calculations are based on additional information provided by the source on August 5, 2013.

After rubber is milled it passes through a suspension of clay (Halcoat) and water solution. 1 drum of clay weighs 200 lbs and coats 150 batches of rubber. Approximately 16,000 batches of rubber are mixed per year at 10 shifts per week.

Actual usage (lb/batch) is the actual amount of Halcoat used per batch of rubber, as reported by the source. Assume worst-case that 5% of material lost is particulate emissions.

PM=PM_{10}=PM_{2.5}

Pursuant to 326 IAC 6-3-1(b)(5), this unit is exempt from 326 IAC 6-3-2 because it uses dip surface coating.

**Methodology:**

- Weight of clay (lb/batch) = Weight of clay (lb/drum) / Clay usage (batches/drum)
- Material loss (lb/batch) = Weight of clay (lb/batch) - Actual usage (lb/batch)
- Maximum throughput (batches/yr) = Actual throughput (batches/yr) / 10 shifts/wk (actual) * 3 shifts/day * 7 days/wk
- Maximum throughput (lb/yr) = Maximum throughput (batches/yr) / Clay usage (batches/drum) * Weight of clay (lb/drum)
Appendix A: Emissions Calculations
Self-contained sand blaster (SBLAST)

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM/lb abrasive</th>
<th>lb PM$_{10}$/lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td>0.70</td>
</tr>
</tbody>
</table>

Uncontrolled PTE of PM and PM$_{10}$

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Number of nozzles</th>
<th>Fraction of time of wet blasting</th>
<th>Flow rate (lb/hr)</th>
<th>PM (lb/lb sand)</th>
<th>PM$_{10}$ (lb/lb PM)</th>
<th>lb/hr</th>
<th>ton/yr</th>
<th>Uncontrolled PTE - PM</th>
<th>Uncontrolled PTE - PM$_{10}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-contained sand blaster</td>
<td>SBLAST</td>
<td>1</td>
<td>0%</td>
<td>12.5</td>
<td>0.041</td>
<td>0.70</td>
<td>0.51</td>
<td>2.24</td>
<td>0.36</td>
<td>1.57</td>
</tr>
</tbody>
</table>

Notes:
These calculations are derived from the Permit Renewal Application received by OAQ on August 30, 2004.

Methodology:
Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb sand) * (1 - Fraction of time of wet blasting/200) * Number of nozzles
Uncontrolled PTE of PM$_{10}$ (lb/hr) = Uncontrolled PTE of PM (lb/hr) * PM$_{10}$ emission factor (lb/lb PM)
Uncontrolled PTE (lb/day) = Uncontrolled PTE (lb/hr) * 24 hrs/day
Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations  
Carbon silos (CSILO)

Company Name: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359  
Significant Source Modification: 009-43813-00002  
Significant Permit Modification: 009-43940-00002  
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Unit ID</th>
<th>Usage (lb/yr)</th>
<th>Estimated loss</th>
<th>PTE of PM (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon silos</td>
<td>CSILO</td>
<td>1,700,000</td>
<td>0.1%</td>
<td>0.85</td>
</tr>
</tbody>
</table>

Notes: 
These calculations are derived from the Permit Renewal Application received by OAQ on August 30, 2004. Usage rate provided by source as carbon usage in 1998.

Calculations
PTE of PM (ton/yr) = Usage (lb/yr) * Estimated loss * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

#### Phosphate lines

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

#### Automatic Phosphate Line (Phosline #1)

<table>
<thead>
<tr>
<th>Tank Material</th>
<th>Material used (gal/month)</th>
<th>Density (lb/gal)</th>
<th>Material used (lb/month)</th>
<th>PTE of PM (ton/yr)</th>
<th>PTE of HCl (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alkaline Soak</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Defoamer</td>
<td>4</td>
<td>9.00</td>
<td>36.0</td>
<td>0.04</td>
<td>--</td>
</tr>
<tr>
<td>CD013 - Soak A</td>
<td>81.5</td>
<td>12.50</td>
<td>1018.8</td>
<td>1.22</td>
<td>--</td>
</tr>
<tr>
<td>Acid Pickle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P518 - Acid</td>
<td>36</td>
<td>11.26</td>
<td>405.3</td>
<td>0.49</td>
<td>--</td>
</tr>
<tr>
<td>Phosphate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CP840 - Phosphate</td>
<td>30.5</td>
<td>13.34</td>
<td>407.0</td>
<td>0.49</td>
<td>--</td>
</tr>
<tr>
<td>748BR - Calcium additive</td>
<td>13</td>
<td>12.18</td>
<td>158.3</td>
<td>0.19</td>
<td>--</td>
</tr>
<tr>
<td>702B - Nitrite additive</td>
<td>0.2</td>
<td>10.84</td>
<td>2.2</td>
<td>0.00</td>
<td>--</td>
</tr>
<tr>
<td>Sealer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RP2324B - Rust Preventative</td>
<td>43</td>
<td>8.84</td>
<td>380.1</td>
<td>0.46</td>
<td>--</td>
</tr>
</tbody>
</table>

**Total:** 2.89

#### Manual Phosphate Line (Phosline #2)

<table>
<thead>
<tr>
<th>Tank Material</th>
<th>Material used (gal/month)</th>
<th>Density (lb/gal)</th>
<th>Material used (lb/month)</th>
<th>PTE of PM (ton/yr)</th>
<th>PTE of HCl (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alkaline Soak</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Descaler</td>
<td>2</td>
<td>9.00</td>
<td>18.0</td>
<td>0.02</td>
<td>--</td>
</tr>
<tr>
<td>CD013 - Soak A</td>
<td>81.5</td>
<td>12.50</td>
<td>1018.8</td>
<td>1.22</td>
<td>--</td>
</tr>
<tr>
<td>CL013 - Soak B</td>
<td>17</td>
<td>12.34</td>
<td>209.8</td>
<td>0.25</td>
<td>--</td>
</tr>
<tr>
<td>Acid Pickle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HCl Acid</td>
<td>47</td>
<td>9.84</td>
<td>462.5</td>
<td>0.56</td>
<td>0.56</td>
</tr>
<tr>
<td>Phosphate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CP840 - Phosphate</td>
<td>30.5</td>
<td>13.34</td>
<td>407.0</td>
<td>0.49</td>
<td>--</td>
</tr>
<tr>
<td>748BR - Calcium additive</td>
<td>13</td>
<td>12.18</td>
<td>158.3</td>
<td>0.19</td>
<td>--</td>
</tr>
<tr>
<td>702B - Nitrite additive</td>
<td>0.2</td>
<td>10.84</td>
<td>2.2</td>
<td>0.00</td>
<td>--</td>
</tr>
<tr>
<td>Sealer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RP2324B - Rust Preventative</td>
<td>43</td>
<td>8.84</td>
<td>380.1</td>
<td>0.46</td>
<td>--</td>
</tr>
<tr>
<td>Alumabrite</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total:** 3.35

#### Automatic Phosphate Line (Phosline #3)

<table>
<thead>
<tr>
<th>Tank Material</th>
<th>Material used (gal/month)</th>
<th>Density (lb/gal)</th>
<th>Material used (lb/month)</th>
<th>PTE of PM (ton/yr)</th>
<th>PTE of HCl (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alkaline Soak</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Defoamer</td>
<td>4</td>
<td>9.00</td>
<td>36.0</td>
<td>0.04</td>
<td>--</td>
</tr>
<tr>
<td>CD013 - Soak A</td>
<td>81.5</td>
<td>12.50</td>
<td>1018.8</td>
<td>1.22</td>
<td>--</td>
</tr>
<tr>
<td>Acid Pickle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P518 - Acid</td>
<td>36</td>
<td>11.26</td>
<td>405.3</td>
<td>0.49</td>
<td>--</td>
</tr>
<tr>
<td>Phosphate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CP840 - Phosphate</td>
<td>30.5</td>
<td>13.34</td>
<td>407.0</td>
<td>0.49</td>
<td>--</td>
</tr>
<tr>
<td>748BR - Calcium additive</td>
<td>13</td>
<td>12.18</td>
<td>158.3</td>
<td>0.19</td>
<td>--</td>
</tr>
<tr>
<td>702B - Nitrite additive</td>
<td>0.2</td>
<td>10.84</td>
<td>2.2</td>
<td>0.00</td>
<td>--</td>
</tr>
<tr>
<td>Sealer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RP2324B - Rust Preventative</td>
<td>43</td>
<td>8.84</td>
<td>380.1</td>
<td>0.46</td>
<td>--</td>
</tr>
</tbody>
</table>

**Total:** 2.89

#### Chlorination Tank

<table>
<thead>
<tr>
<th>Tank Material</th>
<th>Material used (gal/month)</th>
<th>Density (lb/gal)</th>
<th>Material used (lb/month)</th>
<th>PTE of PM (ton/yr)</th>
<th>PTE of HCl (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorination</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HCl Acid</td>
<td>4</td>
<td>9.84</td>
<td>39.4</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>Sodium hypochlorite</td>
<td>81.5</td>
<td>9.75</td>
<td>794.6</td>
<td>0.48</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total:** 0.50

---

**Methodology:**  
These calculations are based on additional information provided by the source on August 5, 2013.  
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS  
Material used (lb/month) = Material used (gal/month) * Density (lb/gal)  
PTE (ton/yr) = Material used (lb/month) * 20% (or 10% for chlorination tank) * 12 months/yr * 1 ton/2000 lbs  
Of the material replenished, 20% from the phos lines and 10% from chlorination is emitted as PM and/or HCl  
PM=PM_{10}=PM_{2.5}  

**Methodology:**  
Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS  
Material used (lb/month) = Material used (gal/month) * Density (lb/gal)  
PTE (ton/yr) = Material used (lb/month) * 20% (or 10% for chlorination tank) * 12 months/yr * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

#### VOC and HAP

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

#### Coating Primer or Adhesive? VOC content (lbs/gal) Total HAP content (lbs/gal) Solids content (% by wt)

<table>
<thead>
<tr>
<th>Coating</th>
<th>Primer or Adhesive</th>
<th>VOC content (lbs/gal)</th>
<th>Total HAP content (lbs/gal)</th>
<th>Solids content (% by wt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemlok 207LH</td>
<td>Primer</td>
<td>3.37</td>
<td>0.15</td>
<td>11.21%</td>
</tr>
<tr>
<td>Chemlok 6411 LH</td>
<td>Adhesive</td>
<td>3.88</td>
<td>0.71</td>
<td>16.71%</td>
</tr>
<tr>
<td>Cilbond 62W</td>
<td>Adhesive</td>
<td>0.32</td>
<td>0.06</td>
<td>28.59%</td>
</tr>
<tr>
<td>Chemlok 607</td>
<td>Adhesive</td>
<td>6.21</td>
<td>3.61</td>
<td>0.17%</td>
</tr>
<tr>
<td>Chemlok 608</td>
<td>Adhesive</td>
<td>6.31</td>
<td>1.40</td>
<td>5.05%</td>
</tr>
<tr>
<td>Chemlok 5150</td>
<td>Adhesive</td>
<td>6.52</td>
<td>1.51</td>
<td>1.38%</td>
</tr>
<tr>
<td>TyPly</td>
<td>Adhesive</td>
<td>4.79</td>
<td>0.24</td>
<td>37%</td>
</tr>
<tr>
<td>Chemlok 8116 - used at Dip and Spin only</td>
<td>Adhesive</td>
<td>0.00</td>
<td>0.001</td>
<td>28.9%</td>
</tr>
</tbody>
</table>

#### Cleaning solvents

<table>
<thead>
<tr>
<th>Cleaning solvents</th>
<th>MEK</th>
<th>MPK</th>
<th>TBA</th>
<th>Xylene</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>6.72</td>
<td>6.76</td>
<td>0.00</td>
<td>7.21</td>
</tr>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>7.21</td>
<td></td>
</tr>
</tbody>
</table>

*All VOC content and HAP content are "as applied"*
### Chemlok 207LH Composition Summary

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

#### Table 1: Emissions Calculations

**Chemlok 207LH**

**Total VOCs:**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 207LH Primer</td>
<td>7.60</td>
<td>1.25</td>
<td>4.22</td>
<td>57.0%</td>
<td>4.22</td>
<td>300%</td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>3.19</td>
<td>33.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2.25</strong></td>
<td><strong>7.41</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>3.27</strong></td>
<td><strong>45.5%</strong></td>
</tr>
</tbody>
</table>

207LH VOC lb/gal per SDS: **6.07**  
TBA is not a VOC or HAP

**Total HAPs**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 207LH Primer</td>
<td>7.60</td>
<td>1.25</td>
<td>4.22</td>
<td>57.0%</td>
<td>0.15</td>
<td>0.15</td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>3.19</td>
<td>33.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2.25</strong></td>
<td><strong>7.41</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>0.15</strong></td>
<td><strong>0.15%</strong></td>
</tr>
</tbody>
</table>

**MBK**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>MBK Density (lb/gal)</th>
<th>MBK Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 207LH Primer</td>
<td>7.60</td>
<td>1.25</td>
<td>4.22</td>
<td>57.0%</td>
<td>0.13</td>
<td>0.13</td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>3.19</td>
<td>33.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2.25</strong></td>
<td><strong>7.41</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>0.13</strong></td>
<td><strong>0.13%</strong></td>
</tr>
</tbody>
</table>

**Formaldehyde**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Formaldehyde Density (lb/gal)</th>
<th>Formaldehyde Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 207LH Primer</td>
<td>7.60</td>
<td>1.25</td>
<td>4.22</td>
<td>57.0%</td>
<td>0.0025</td>
<td>0.0025</td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>3.19</td>
<td>33.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2.25</strong></td>
<td><strong>7.41</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>0.003</strong></td>
<td><strong>0.003%</strong></td>
</tr>
</tbody>
</table>

**Solids**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 207LH Primer</td>
<td>7.60</td>
<td>1.25</td>
<td>4.22</td>
<td>57.0%</td>
<td>0.8309</td>
<td>0.8309</td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>3.19</td>
<td>33.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2.25</strong></td>
<td><strong>7.41</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>0.831</strong></td>
<td><strong>11.21%</strong></td>
</tr>
</tbody>
</table>
### Appendix A: Emissions Calculations

**Chemlok 5150 Composition Summary**

**Company Name:** BRC Rubber & Plastics, Inc.

**Source Address:** 823 West Monroe Street, Montpelier, Indiana 47359

**Significant Source Modification:** 009-43813-00002

**Significant Permit Modification:** 009-43940-00002

**Reviewer:** Hachem Ismaili Alaoui

#### Chemlok 5150

**Total VOCs:**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (%) by wt</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 5150</td>
<td>Lord</td>
<td>6.85</td>
<td>1.00</td>
<td>1.71</td>
<td>25.7%</td>
<td>25.0%</td>
<td>92.4%</td>
<td>1.58</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.59</td>
<td>3.00</td>
<td>4.94</td>
<td>74.3%</td>
<td>75.0%</td>
<td>100.0%</td>
<td>4.94</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>4.00</td>
<td>6.65</td>
<td>100%</td>
<td>100%</td>
<td>192.4%</td>
<td>6.52</td>
<td>98%</td>
</tr>
</tbody>
</table>

**VOC lb/gal per AQDS** 6.33

#### Total HAPs

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 5150</td>
<td>Lord</td>
<td>6.85</td>
<td>1.00</td>
<td>1.71</td>
<td>25.7%</td>
<td>25.0%</td>
<td>88.0%</td>
<td>1.51</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>re 6.59</td>
<td>3.00</td>
<td>4.94</td>
<td>74.3%</td>
<td>75.0%</td>
<td>0.0%</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>4.00</td>
<td>6.65</td>
<td>100%</td>
<td>100%</td>
<td>88.0%</td>
<td>1.51</td>
<td>22.66%</td>
</tr>
</tbody>
</table>

#### Methanol

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal)</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 5150</td>
<td>Lord</td>
<td>6.85</td>
<td>1.00</td>
<td>1.71</td>
<td>25.7%</td>
<td>25.0%</td>
<td>88.0%</td>
<td>1.51</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.59</td>
<td>3.00</td>
<td>4.94</td>
<td>74.3%</td>
<td>75.0%</td>
<td>0.0%</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>4.00</td>
<td>6.65</td>
<td>100%</td>
<td>100%</td>
<td>88.0%</td>
<td>1.51</td>
<td>22.66%</td>
</tr>
</tbody>
</table>

#### Solids

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 5150</td>
<td>Lord</td>
<td>6.85</td>
<td>1.00</td>
<td>1.71</td>
<td>25.7%</td>
<td>25.0%</td>
<td>0.4%</td>
<td>0.09</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.58888</td>
<td>3.00</td>
<td>4.94</td>
<td>74.3%</td>
<td>75.0%</td>
<td>0.0%</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>4.00</td>
<td>6.65</td>
<td>100%</td>
<td>100%</td>
<td>5.4%</td>
<td>0.09</td>
<td>1.38%</td>
</tr>
</tbody>
</table>
Appendix A: Emissions Calculations
Chemlok 6411LH composition Summary

Company Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Significant Source Modification: 009-43813-00002
Significant Permit Modification: 009-43940-00002
Reviewer: Hachem Ismaili Alaoui

Chemlok 6411LH

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>VOCs (% by wt) in Part</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (% by wt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>70%</td>
<td>67%</td>
<td>70%</td>
<td>3.88</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>70%</td>
<td>3.88</td>
<td>2.82</td>
<td>49.5%</td>
</tr>
</tbody>
</table>

VOCs per AQDS: 5.82
TBA is not a VOC or HAP

Total HAPs

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>HAPs (% by wt) in Part</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>70%</td>
<td>67%</td>
<td>12.8%</td>
<td>0.71</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>12.8%</td>
<td>0.71</td>
<td>9.0%</td>
<td></td>
</tr>
</tbody>
</table>

Xylene

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Xylene (% by Wt) in Part</th>
<th>Xylene Density (lb/gal)</th>
<th>Xylene Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>10.22%</td>
<td>0.57</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>10.2%</td>
<td>0.57</td>
<td>7.1%</td>
<td></td>
</tr>
</tbody>
</table>

Ethylbenzene

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Ethylbenzene (% by Wt) in Part</th>
<th>Ethylbenzene Density (lb/gal)</th>
<th>Ethylbenzene Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>2.4%</td>
<td>0.13</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>2.4%</td>
<td>0.13</td>
<td>1.7%</td>
<td></td>
</tr>
</tbody>
</table>

Toluene

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Toluene (% by Wt) in Part</th>
<th>Toluene Density (lb/gal)</th>
<th>Toluene Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>0.1%</td>
<td>0.01</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>0.1%</td>
<td>0.01</td>
<td>0.1%</td>
<td></td>
</tr>
</tbody>
</table>

Methanol

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal)</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>0.06%</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>0.06%</td>
<td>0.00</td>
<td>0.04%</td>
<td></td>
</tr>
</tbody>
</table>

1,1,2-Trichloroethylene

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>1,1,2-Trichloroethylene (% by Wt) in Part</th>
<th>1,1,2-Trichloroethylene Density (lb/gal)</th>
<th>1,1,2-Trichloroethylene Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>0.03%</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>0.03%</td>
<td>0.00</td>
<td>0.02%</td>
<td></td>
</tr>
</tbody>
</table>

Solids

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 6411LH adhesive</td>
<td>8.30</td>
<td>2.00</td>
<td>5.53</td>
<td>69.8%</td>
<td>67%</td>
<td>23.93%</td>
<td>1.324</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Tert Butyl acetate</td>
<td>7.17</td>
<td>1.00</td>
<td>2.39</td>
<td>30.2%</td>
<td>33%</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>3.00</td>
<td>7.92</td>
<td>100%</td>
<td>100%</td>
<td>23.93%</td>
<td>1.324</td>
<td>16.71%</td>
<td></td>
</tr>
</tbody>
</table>
### Cilbond 62W

**Total VOCs:**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cilbond 62W</td>
<td>HB Fuller</td>
<td>9.26</td>
<td>1.00</td>
<td>7.41</td>
<td>82%</td>
<td>80%</td>
<td>4.3%</td>
<td>0.32</td>
<td>0.32</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1.25</td>
<td>9.08</td>
<td>100%</td>
<td>100%</td>
<td>4%</td>
<td>0.32</td>
<td>3.53%</td>
<td></td>
</tr>
</tbody>
</table>

VOC lb/gal per AQDS 0.4

**Total HAPs**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cilbond 62W</td>
<td>HB Fuller</td>
<td>9.26</td>
<td>1.00</td>
<td>7.41</td>
<td>82%</td>
<td>80%</td>
<td>0.8%</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1.25</td>
<td>9.08</td>
<td>100%</td>
<td>100%</td>
<td>0.8%</td>
<td>0.06</td>
<td>0.7%</td>
<td></td>
</tr>
</tbody>
</table>

**Phenol**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Phenol (% by Wt) in Part</th>
<th>Phenol Density (lb/gal)</th>
<th>Phenol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cilbond 62W</td>
<td>HB Fuller</td>
<td>9.26</td>
<td>1.00</td>
<td>7.41</td>
<td>82%</td>
<td>80%</td>
<td>0.20%</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1.25</td>
<td>9.08</td>
<td>100%</td>
<td>100%</td>
<td>0.2%</td>
<td>0.01</td>
<td>0.16%</td>
<td></td>
</tr>
</tbody>
</table>

**Methanol**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal)</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cilbond 62W</td>
<td>HB Fuller</td>
<td>9.26</td>
<td>1.00</td>
<td>7.41</td>
<td>82%</td>
<td>80%</td>
<td>0.6%</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1.25</td>
<td>9.08</td>
<td>100%</td>
<td>100%</td>
<td>0.6%</td>
<td>0.04</td>
<td>0.49%</td>
<td></td>
</tr>
</tbody>
</table>

**Solids**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cilbond 62W</td>
<td>HB Fuller</td>
<td>9.26</td>
<td>1.00</td>
<td>7.41</td>
<td>82%</td>
<td>80%</td>
<td>35.0%</td>
<td>2.60</td>
<td>2.60</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0.90%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1.25</td>
<td>9.08</td>
<td>100%</td>
<td>100%</td>
<td>35.0%</td>
<td>2.60</td>
<td>28.59%</td>
<td></td>
</tr>
</tbody>
</table>
### Chemlok 607 Composition Summary

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

#### Appendix A: Emissions Calculations

**Chemlok 607**

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lord</td>
<td>6.92</td>
<td>2.00</td>
<td>4.61</td>
<td>97.7%</td>
<td>87.0%</td>
<td>4.91</td>
<td>1.00</td>
<td>3.00</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>6.59</td>
<td>1.00</td>
<td>2.20</td>
<td>32.3%</td>
<td>33.0%</td>
<td>2.20</td>
<td>0.00</td>
<td>2.20</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>3.00</td>
<td>6.81</td>
<td>100%</td>
<td>100%</td>
<td>6.21</td>
<td>91%</td>
<td></td>
</tr>
</tbody>
</table>

**VOCs lb/gal per AQDS:** 6.02

#### Total HAPs

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lord</td>
<td>6.92</td>
<td>2.00</td>
<td>4.61</td>
<td>97.7%</td>
<td>86.7%</td>
<td>3.61</td>
<td>1.00</td>
<td>3.61</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>6.59</td>
<td>1.00</td>
<td>2.20</td>
<td>32.3%</td>
<td>33.3%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>3.00</td>
<td>6.81</td>
<td>100%</td>
<td>100%</td>
<td>3.61</td>
<td>53.08%</td>
<td></td>
</tr>
</tbody>
</table>

#### Methanol

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal)</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lord</td>
<td>6.92</td>
<td>2.00</td>
<td>4.61</td>
<td>97.7%</td>
<td>86.7%</td>
<td>3.60</td>
<td>1.00</td>
<td>3.60</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>6.58</td>
<td>1.00</td>
<td>2.20</td>
<td>32.3%</td>
<td>33.3%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>3.00</td>
<td>6.81</td>
<td>100%</td>
<td>100%</td>
<td>3.60</td>
<td>52.91%</td>
<td></td>
</tr>
</tbody>
</table>

#### HCl

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>HCl (% by Wt) in Part</th>
<th>HCl Density (lb/gal)</th>
<th>HCl Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lord</td>
<td>6.92</td>
<td>2.00</td>
<td>4.61</td>
<td>97.7%</td>
<td>86.7%</td>
<td>0.25%</td>
<td>0.012</td>
<td>0.012</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>6.58</td>
<td>1.00</td>
<td>2.20</td>
<td>32.3%</td>
<td>33.3%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>3.00</td>
<td>6.81</td>
<td>100%</td>
<td>100%</td>
<td>0.25%</td>
<td>0.012</td>
<td>0.012</td>
</tr>
</tbody>
</table>

#### Solids

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lord</td>
<td>6.92</td>
<td>2.00</td>
<td>4.61</td>
<td>97.7%</td>
<td>86.7%</td>
<td>0.25%</td>
<td>0.012</td>
<td>0.012</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>6.58</td>
<td>1.00</td>
<td>2.20</td>
<td>32.3%</td>
<td>33.3%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>3.00</td>
<td>6.81</td>
<td>100%</td>
<td>100%</td>
<td>0.25%</td>
<td>0.012</td>
<td>0.012</td>
</tr>
</tbody>
</table>
### Appendix A: Emissions Calculations

#### Chemlok 608 Composition Summary

**Company Name:** BRC Rubber & Plastics, Inc.  
**Source Address:** 623 West Monroe Street, Montpelier, Indiana 47359  
**Significant Source Modification:** 009-43813-00002  
**Significant Permit Modification:** 009-43940-00002  
**Reviewer:** Hachem Ismaili Alaoui

**Total VOCs:**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Mixed, Total (% by wt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 608</td>
<td>Lord</td>
<td>7.16</td>
<td>1.00</td>
<td>1.79</td>
<td>26.6%</td>
<td>25.0%</td>
<td>76.5%</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.89</td>
<td>3.00</td>
<td>4.94</td>
<td>73.4%</td>
<td>75.0%</td>
<td>100.0%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>4.00</td>
<td>6.73</td>
<td>100%</td>
<td>100%</td>
<td>176.5%</td>
<td>6.31</td>
</tr>
</tbody>
</table>

**VOC lb/gal per AQDS 5.48**

**Total HAPs**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 608</td>
<td>Lord</td>
<td>7.16</td>
<td>1.00</td>
<td>1.79</td>
<td>26.6%</td>
<td>25.0%</td>
<td>76.4%</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.89</td>
<td>3.00</td>
<td>4.94</td>
<td>73.4%</td>
<td>75.0%</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>4.00</td>
<td>6.73</td>
<td>100%</td>
<td>100%</td>
<td>76.4%</td>
<td>1.40</td>
</tr>
</tbody>
</table>

**Methanol**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 608</td>
<td>Lord</td>
<td>7.16</td>
<td>1.00</td>
<td>1.79</td>
<td>26.6%</td>
<td>25.0%</td>
<td>78.1%</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.89</td>
<td>3.00</td>
<td>4.94</td>
<td>73.4%</td>
<td>75.0%</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>4.00</td>
<td>6.73</td>
<td>100%</td>
<td>100%</td>
<td>78.1%</td>
<td>1.40</td>
</tr>
</tbody>
</table>

**HCl**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>HCl (% by Wt) in Part</th>
<th>HCl Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 608</td>
<td>Lord</td>
<td>7.16</td>
<td>1.00</td>
<td>1.79</td>
<td>26.6%</td>
<td>25.0%</td>
<td>0.25%</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.5886</td>
<td>3.00</td>
<td>4.94</td>
<td>73.4%</td>
<td>75.0%</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Solids**

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chemlok 608</td>
<td>Lord</td>
<td>7.16</td>
<td>1.00</td>
<td>1.79</td>
<td>26.6%</td>
<td>25.0%</td>
<td>19.00%</td>
</tr>
<tr>
<td>2</td>
<td>Ethanol</td>
<td>Univar</td>
<td>6.5886</td>
<td>3.00</td>
<td>4.94</td>
<td>73.4%</td>
<td>75.0%</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.04</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.54</td>
</tr>
</tbody>
</table>

[460x777]
Appendix A: Emissions Calculations

8116 Composition Summary

Total VOCs:

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Density (lb/gal) [Density x (%VOC) x (Mix Ratio)]</th>
<th>VOCs Mixed, Total (% by wt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8116</td>
<td>Lord</td>
<td>9.65</td>
<td>1.00</td>
<td>7.72</td>
<td>82%</td>
<td>88%</td>
<td>0.0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

VOC lb/gal per AQDS: 0

Total HAPs:

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Density (lb/gal) [Density x (%VOC) x (Mix Ratio)]</th>
<th>HAPs Mixed, Total (%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8116</td>
<td>Lord</td>
<td>9.65</td>
<td>1.00</td>
<td>7.72</td>
<td>82%</td>
<td>88%</td>
<td>0.01%</td>
<td>0.001</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.001</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Methanol:

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal) [Density x (%VOC) x (Mix Ratio)]</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8116</td>
<td>Lord</td>
<td>9.65</td>
<td>1.00</td>
<td>7.72</td>
<td>82%</td>
<td>88%</td>
<td>0.01%</td>
<td>0.001</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.001</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Solids:

<table>
<thead>
<tr>
<th>Part*</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix* (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal) [Density x (%VOC) x (Mix Ratio)]</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8116</td>
<td>Lord</td>
<td>9.65</td>
<td>1.00</td>
<td>7.72</td>
<td>82%</td>
<td>88%</td>
<td>35.13%</td>
<td>2.712</td>
<td>28.9%</td>
</tr>
<tr>
<td>2</td>
<td>Water</td>
<td>NA</td>
<td>8.34</td>
<td>0.25</td>
<td>1.67</td>
<td>18%</td>
<td>20%</td>
<td>0%</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2.712</td>
<td>28.9%</td>
</tr>
</tbody>
</table>
## TyPly Composition Summary

### Company Name:
BRC Rubber & Plastics, Inc.

### Source Address:
623 West Monroe Street, Montpelier, Indiana 47359

### Significant Source Modification:
09-43813-00002

### Significant Permit Modification:
09-43940-00002

### Reviewer:
Hachem Ismaili Alaouli

### TyPly

#### Total VOCs:

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>VOCs (% by Wt) in Part</th>
<th>VOCs Density (lb/gal)</th>
<th>VOCs Mixed, Total (% by wt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>60.9%</td>
<td>4.79</td>
<td>61%</td>
</tr>
</tbody>
</table>

#### Total HAPs

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>HAPs (% by Wt) in Part</th>
<th>HAPs Density (lb/gal)</th>
<th>HAPs Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>3.1%</td>
<td>0.24</td>
<td>3.1%</td>
</tr>
</tbody>
</table>

#### Methanol

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Methanol (% by Wt) in Part</th>
<th>Methanol Density (lb/gal)</th>
<th>Methanol Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>2.0%</td>
<td>0.16</td>
<td>2.01%</td>
</tr>
</tbody>
</table>

#### MIBK

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>MIBK (% by Wt) in Part</th>
<th>MIBK Density (lb/gal)</th>
<th>MIBK Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>1.04%</td>
<td>0.08</td>
<td>1.04%</td>
</tr>
</tbody>
</table>

#### Hexane

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Hexane (% by Wt) in Part</th>
<th>Hexane Density (lb/gal)</th>
<th>Hexane Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>0.05%</td>
<td>0.004</td>
<td>0.05%</td>
</tr>
</tbody>
</table>

#### Solids

<table>
<thead>
<tr>
<th>Part</th>
<th>Manufacturer</th>
<th>Name</th>
<th>Density (lb/gal)</th>
<th>Vol in Mix (gal)</th>
<th>Density in Mix (lb/gal)</th>
<th>Mix Ratio (wt%)</th>
<th>Mix Ratio (Vol%)</th>
<th>Solids (% by Wt) in Part</th>
<th>Solids Density (lb/gal)</th>
<th>Solids Mixed, Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TyPly</td>
<td>Lord</td>
<td>7.86</td>
<td>1.00</td>
<td>7.86</td>
<td>100.0%</td>
<td>100.0%</td>
<td>37.00%</td>
<td>2.968</td>
<td>37.00%</td>
</tr>
</tbody>
</table>

VOC lb/gal per AQDS: 4.79
May 10, 2021

Patrick DeLong
BRC Rubber & Plastics, Inc.
1029-A W State Blvd
Fort Wayne, IN 46808

Re: Public Notice
BRS Rubber & Plastics, Inc.
Permit Level: Title V Sig Source Mod Minor PSD
Title V Sig Permit Mod
Permit Number: 009-43813-00002
009-43940-00002

Dear Mr. DeLong:

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/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43813 or 43940

and

IDEM’s Virtual File Cabinet (VFC): [https://www.IN.gov/idem](https://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/public-notices/](https://www.in.gov/idem/public-notices/)

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 Montpelier-Harrison Township Public Library, 301 South Main Street in Montpelier, IN. 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 Hachem Ismaili Alaoui, 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 2-2827 or dial (317) 232-2827.

Sincerely,

Theresa Weaver
Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter access via website 8/10/2020
May 10, 2021

To: Montpelier-Harrison Township Public Library

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: BRC Rubber & Plastics, Inc.
Permit Number: 009-43813-00002; 009-43940-00002

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 Smiddle-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.
Notice of Public Comment

May 10, 2021
BRC Rubber & Plastics, Inc.
009-43813-00002; 009-43940-00002

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/public-notices/.

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

May 10, 2021

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

Permit Number: 009-43813-00002; 009-43940-00002
Applicant Name: BRC Rubber & Plastics, Inc.
Location: Montpelier, Blackford 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 or (317) 233-2414.
**Mail Code 61-53**

<table>
<thead>
<tr>
<th>Line</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Patrick DeLong  BRC RUBBER &amp; PLASTICS INC 1029-A W State Blvd Fort Wayne IN 46808 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Blackford County Commissioners 110 West Washington Street Hartford City IN 47348  (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Ms. Mary Shipley  10698 E 100 S Marion IN 46953  (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Montpelier-Harrison Township Public Library 301 S Main St Montpelier IN 47359-1428  (Library)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Daryl &amp; Lois Hoffman  7750 N. CR 75 E Lizton IN 46149  (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Mr. Dan Baughhey  103 Lakeview Drive Hartford City IN 47348  (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Montpelier City Council and Mayors Office 300 W. Huntington St. Montpelier IN 47359  (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Barbara Knecht HZW Environmental Consultants LLC 6105 Heisley Rd Mentor OH 44060  (Consultant)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total number of pieces Listed by Sender: 10
Total number of Pieces Received at Post Office: 10

Postmaster, Per (Name of Receiving employee):  

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.