



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

To: Interested Parties

Date: June 27, 2024

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

Source Name: Bottcher America Corporation

Permit Level: Registration Administrative Amendment

Permit Number: 159-47853-00015

Source Location: 717 W Industrial Dr, Tipton, IN 46072

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, choose Search Option **by Permit Number**, then enter permit 47853. This search will also provide the application received date and **final** permit issuance date.

The final decision is also available via IDEM's Virtual File Cabinet (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.

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room N103, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

Kerry Jackson
Bottcher America Corporation
717 W Industrial Dr.
Tipton, IN 46072

Re: 159-47853-00015
Administrative Amendment to
Registration No. R159-37288-00015

Dear Kerry Jackson:

Bottcher America Corporation was issued a Registration No. R159-37288-00015 on August 15, 2016 for a stationary manufacturing facility for rubber coated rollers for printing presses located at 717 W Industrial Dr., Tipton, IN 46072. On May 20, 2024, the Office of Air Quality (OAQ) received an application from the source requesting to add a polyurethane rollers refurbishing line to the source permit..

Pursuant to 326 IAC 2-5.5-6, the registration is hereby amended as described in the attached Technical Support Document.

All other conditions of the registration shall remain unchanged and in effect.

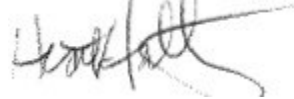
Please find attached the entire registration as amended.

A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and registration 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 Sarah Germann, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath Hartley", with a long horizontal stroke extending to the right.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Revised Registration and Technical Support Document

cc: File - Tipton County
Tipton County Health Department
Compliance and Enforcement Branch



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor


Brian C. Rockensuess
Commissioner

REGISTRATION OFFICE OF AIR QUALITY

**Bottcher America Corporation
717 W Industrial Drive
Tipton, Indiana 46072**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R159-37288-00015 Master Agency Interest ID.: 61267	
Original signed by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 15, 2016

Registration Administrative Amendment No. 159-47853-00015	
Issued by:  Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 27, 2024

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary manufacturing facility for rubber coated rollers for printing presses.

Source Address:	717 W Industrial Dr., Tipton, IN 46072
General Source Phone Number:	(765) 675-4449
SIC Code:	2796 (Plate Making and Related Services)
County Location:	Tipton County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) rubber removal stations, identified as EU-01 and EU-02 respectively, constructed in 1997 and 2013, with a capacity of 270 standard rollers per day and 9 industrial rollers per day, each station equipped with a baghouse, and exhausting to the atmosphere through stacks S-01 and S-02, respectively.
- (b) One (1) Wheelabrator enclosed shot blast system, identified as EU-03, constructed in 1997, with a maximum throw rate of 28,500 lb/hr of shot material, with a capacity of 270 standard rollers per day and 9 industrial rollers per day, equipped with a baghouse, and exhausting to the atmosphere through stack S-03.
- (c) One (1) Solutioning table for brush-applied primer and adhesive, identified as EU-04, constructed in 1997, with a capacity of 270 standard rollers per day, 9 industrial rollers, and 72 flexographic sleeves per day, exhausting to the atmosphere through stack S-04.
- (d) One (1) steam-powered Vulcanizer autoclave, identified as EU-05, constructed in 1997, with a capacity of 270 standard rollers per day, 9 industrial rollers, and 72 flexographic sleeves per day, exhausting to the atmosphere through stack S-05.
- (e) Two (2) roller finishing stations, identified as EU-06 and EU-07 respectively, constructed in 1997 and 2013, each consisting of a trimming station, grinding station, and polishing station, with a capacity of 270 standard rollers per day, 9 industrial rollers, and 72 flexographic sleeves per day, each equipped with a baghouse, and exhausting to the atmosphere through stacks S-06 and S-07, respectively.
- (f) One (1) natural gas-fired boiler, with a maximum heat capacity of 1.4 MMBtu/hr, constructed in 1997, identified as EU-08, exhausting to the atmosphere through stack S-08.
- (g) A flexographic sleeve make-up operation, consisting of brush-applied epoxy and hardener and an electric curing oven, constructed in 2006, identified as EU-09, with a capacity of 72 flexographic sleeves per day, exhausting indoors.

- (h) Polyurethane Rollers refurbishing line, constructed in 2023, with a maximum capacity of 30 rollers per day, using a baghouse as control, and exhausting to a stack. The line consists of the following:
 - i. removal station
 - ii. aqueous cleaning system
 - iii. adhesive application
 - iv. production of new polyurethane coating
 - v. polyurethane material application
 - vi. electric curing oven
 - vii. trimming, grinding, and polishing station

- (i) Paved Roads.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration R159-37288-00015 is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R159-37288-00015 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)][326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

- (b) 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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (b) One (1) Wheelabrator enclosed shot blast system, identified as EU-03, constructed in 1997, with a maximum throw rate of 28,500 lb/hr of shot material, with a capacity of 270 standard rollers per day and 9 industrial rollers per day, equipped with a baghouse, and exhausting to the atmosphere through stack S-03.

(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 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Wheelabrator enclosed shot blast system, identified as EU03, shall not exceed the emission limits as shown in the table below.

Operation	Process Weight Rate (tons/hr)	Allowable Emission Rate (lbs/hr)
Wheelabrator enclosed shot blast system (EU-03)	14.25	24.31

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the 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.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Bottcher America Corporation
Source Address:	717 W Industrial Dr.
City:	Tipton, Indiana, 46072
Phone Number:	(765) 675-4449
Registration No.:	R159-37288-00015

I hereby certify that Bottcher America Corporation is:

still in operation.

I hereby certify that Bottcher America Corporation is:

no longer in operation.

in compliance with the requirements of Registration No. R159-37288-00015.

not in compliance with the requirements of Registration No. R159-37288-00015.

Authorized Individual (typed):	
Title:	
Signature:	Date:
Email Address:	Phone:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

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

**Technical Support Document (TSD) for a Registration Administrative
Amendment (AA)**

Source Description and Location

Source Name:	Bottcher America Corporation
Source Location:	717 W Industrial Dr., Tipton, IN 46072
County:	Tipton County
SIC Code:	2796 (Platemaking and Related Services)
Registration No.:	R 159-37288-00015
Registration Issuance Date:	August 15, 2016
Registration Administrative Amendment No.:	159-47853-00015
Permit Reviewer:	Sarah Germann

On May 20, 2024, the Office of Air Quality (OAQ) received an application from Bottcher America Corporation related to changes at an existing stationary manufacturing facility for rubber coated rollers for printing presses.

Existing Approvals

The source was issued Registration No. 159-37288-00015 on August 15, 2016. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Tipton County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

Pollutant	Designation
SO ₂	Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Tipton County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Tipton 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

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of Registration (326 IAC 2-5.1-5) 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

This table reflects the unrestricted potential emissions of the source prior to the proposed administrative amendment. 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.

Unrestricted Source-Wide Emissions Prior to Administrative Amendment (tons/year)									
	PM¹	PM₁₀¹	PM_{2.5}^{1,2}	SO₂	NO_x	VOC	CO	Single HAP³	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	24.73	22.94	22.60	negl.	0.60	12.33	0.50	3.80	9.47
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP.									

These emissions are based on the TSD of Registration No. 159-37288-00015, issued on August 15, 2016.

**Emission Units and Pollution Control Equipment
 Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)**

As part of this permitting action, the source requested to add the following existing emission unit(s) constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):

- (h) Polyurethane Rollers refurbishing line, constructed in 2023, with a maximum capacity of 30 rollers per day, using a baghouse as control, and exhausting to a stack. The line consists of the following:
 - i. removal station
 - ii. aqueous cleaning system
 - iii. adhesive application
 - iv. production of new polyurethane coating
 - v. polyurethane material application
 - vi. electric curing oven
 - vii. trimming, grinding, and polishing station

The total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit(s) did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-5.5-6(d), the registration requirements under 326 IAC 2-5.5-6(g) do not apply to the emission unit(s). See Appendix A of this Technical Support Document for detailed emission calculations.

Enforcement Issues

There are no pending enforcement actions related to this administrative amendment.

Emission Calculations

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

Permit Level Determination – Registration Administrative Amendment

The following table is used to determine the appropriate revision level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the administrative amendment. 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.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								Total HAPs (Toluene)
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	
Polyurethane Roller Processing	0.13	0.13	0.13	-	-	1.46	-	-	-
Polyurethane adhesive	-	-	-	-	-	3.29	-	0.34	0.34
Total PTE Before Controls of the New Emission Units:	0.13	0.13	0.13	-	-	4.75	-	0.34	0.34

¹PM_{2.5} listed is direct PM_{2.5}.

²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the administrative amendment.

Pursuant to 326 IAC 2-5.5-6(d)(11), this change to the permit is considered an administrative amendment, because the permit is amended to add or modify emissions unit(s) described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31). The emission unit(s) being added is a polyurethane refurbishing like, and the total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G).

PTE of the Entire Source After Issuance of the Registration Administrative Amendment

The table below summarizes the after issuance source-wide unrestricted potential to emit. 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.

	Unrestricted Source-Wide Emissions After Issuance (ton/year) (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Including Source-Wide Fugitives	24.86	23.07	22.72	negl.	0.60	17.08	0.50	3.80 (Carbon disulfide)	9.81
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 10	< 25
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP.									

- (a) This administrative amendment will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of PM, PM₁₀, PM_{2.5}, SO₂, NO_x, and CO will each still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the potential to emit of all other regulated air pollutants will each still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This administrative amendment will not change the registration status of the source, because the source-wide uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the uncontrolled/unlimited potential to emit of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). This source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

Due to this administrative amendment, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for the Rubber Tire Manufacturing Industry, 40 CFR 60, Subpart BBB and 326 IAC 12, are not included in the registration for this source, because this source is not a rubber tire manufacturing plant, and this unit is not any of the units listed in §60.540(a).
- (b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production, 40 CFR 63, Subpart III and 326 IAC 20-22 are not included in the registration for the polyurethane roller refurbishing line, since it does not meet the criteria in §63.1290(a)(1) through (3) because it is not located at a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Rubber Tire Manufacturing, 40 CFR 63, Subpart XXXX and 326 IAC 20-55 are not included in the registration for this source, since this source is not a major source of hazardous air pollutant (HAP) emissions, and it does not own or operate a tire manufacturing facility.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63, Subpart MMMMM and 326 IAC 20-66 are not included in the registration for this source, since it is not a flame lamination affected source as defined in §63.8784(b)(2) and it is not located as a major source of HAP.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63, Subpart OOOOOO are not included in the registration for the Polyurethane Roller Refurbishing Line, since the polyurethane product created does not have open cells which means the material is not a foam. This plant does not produce flexible polyurethane foam or rebond foam and does not laminate or bond polyurethane foam together or to other substrates.
- (e) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the registration.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

326 IAC 2-5.5 (Registrations)

Registration applicability is discussed under the PTE of the Entire Source After Issuance of the Registration Administrative Amendment section of this document.

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

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. 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 Tipton 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 Tipton County) is not subject to the requirements of 326 IAC 6.8, because it is not located in Lake County.

State Rule Applicability – Individual Facilities

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

Polyurethane Rollers refurbishing line

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

Pursuant to 326 IAC 6-3-1(b)(14), the refurbishing line is not subject to the requirements of 326 IAC 6-3, since the PTE of PM is less than 0.551 lb/hr. Pursuant to 326 IAC 6-3-1(b)(8), the adhesive application is not subject to the requirements of 326 IAC 6-3, since the adhesive is applied by brush coating.

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

Even though, this polyurethane rollers refurbishing line 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)(1)(E) the polyurethane roller refurbishing line is not subject to the requirements of 326 IAC 8-2-9, because this source has the SIC code 2796, which is not in any of the major groups #33, #34, #35, #36, #37, #38, or #39 and thus not regulated by this rule.

Proposed Changes

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

- (1) Addition of the Polyurethane Rollers refurbishing line to the source permit.

Additional Changes

Upon further review, IDEM, OAQ has decided to make the following changes to the registration. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Minor updates to language in the B and D sections of the permit.

- (2) Updates to the annual notification form to include the email address and phone number of the authorized individual.
- (3) The source address on permit documents was updated from 717 Industrial Dr. to 717 W Industrial Dr.

A.1 General Information

The Registrant owns and operates a stationary manufacturing facility for rubber coated rollers for printing presses.

Source Address: 717 W Industrial Dr., Tipton, IN 46072

A.2 Emission Units and Pollution Control Equipment Summary

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

(h) **Polyurethane Rollers refurbishing line, constructed in 2023, with a maximum capacity of 30 rollers per day, using a baghouse as control, and exhausting indoors. The line consists of the following:**

- i. removal station
- ii. aqueous cleaning system
- iii. adhesive application
- iv. production of new polyurethane coating
- v. polyurethane material application
- vi. electric curing oven
- vii. trimming, grinding, and polishing station

(ih) Paved ~~Roads~~roadways.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration **R159-37288-00015** is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

D.1.1 Particulate Emission Limitations for ~~Manufacturing Processes~~ [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), **particulate emissions from the Wheelabrator enclosed shot blast system, identified as EU03**, the allowable particulate matter (PM) emissions from the ~~Wheelabrator enclosed shot blast system, identified as EU-03~~, shall not exceed the emission limits as shown in the table below.

$$E = 4.10 P^{0.67}$$

Where **E = rate of emission in pounds per hour; and**
P = process weight rate in tons per hour
~~P = process weight in tons/hr; and~~
~~E = rate of emission in pounds per hour.~~

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

REGISTRATION

ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Source Address:	717 W Industrial Dr.
------------------------	----------------------

Authorized Individual (typed):	
Title:	
Signature:	Date:
Email Address:	Phone:

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 20, 2024.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Sarah Germann, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Sarah Germann or (317) 234-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <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/>.

**Appendix A: Emission Calculations
PTE Summary**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Uncontrolled Potential to Emit (tons/yr)										
Emissions Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs**	Highest Single HAP	
Rubber removal and finishing	0.15	0.15	0.15	-	-	1.72	-	1.40	0.28	1,3 butadiene***
Shot blasting	22.29	22.29	22.29	-	-	-	-	-	-	-
Solutioning Table (Primer-Adhesive)	-	-	-	-	-	6.47	-	4.19	1.34	Xylene
Vulcanizer	-	-	-	-	-	3.94	-	3.87	3.80	Carbon disulfide
Flexographic Sleeves	-	-	-	-	-	0.17	-	-	-	-
Polyurethane roller processing	0.13	0.13	0.13	-	-	1.46	-	-	-	-
Polyurethane adhesive	-	-	-	-	-	3.29	-	0.34	0.34	Toluene
Boiler	0.01	0.05	0.05	3.61E-03	0.60	0.03	0.50	0.01	0.01	Hexane
Total Excluding Fugitives	22.58	22.61	22.61	3.61E-03	0.60	17.08	0.50	9.81	3.80	Carbon disulfide
Fugitive Emissions										
<i>Paved Roads</i>	<i>2.28</i>	<i>0.46</i>	<i>0.11</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>
Total Fugitives	2.28	0.46	0.11	-	-	-	-	-	-	-
Total Including Fugitives	24.86	23.07	22.72	3.61E-03	0.60	17.08	0.50	9.81	3.80	Carbon disulfide

* PM2.5 listed is direct PM2.5

**Fugitive HAP emissions are always included in the source-wide emissions

***See note of Rubber removal & finishing tab.

**Appendix A: Emission Calculations
Modification Summary**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Uncontrolled Potential to Emit of New Units (tons/year)									
Emission Unit	PM	PM₁₀	PM_{2.5}*	SO₂	NO_x	VOC	CO	Combined HAPs	Single HAP (Toluene)
Polyurethane Roller Processing	0.13	0.13	0.13	-	-	1.46	-	-	-
Polyurethane adhesive	-	-	-	-	-	3.29	-	0.34	0.34
Total (tons/year):	0.13	0.13	0.13	0.00	0.00	4.75	0.00	0.34	0.34

**PM_{2.5} listed is direct PM_{2.5}*

Appendix A: Emission Calculations
Rubber removal and refinishing process emissions

Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann

Emission Unit ID	Process	Rubber removed per roller (lb/roller)	Rollers/yr	lb rubber removed/yr	PM/PM10/PM2.5			VOC		HAPs	
					Emission factor (lb/lb rubber removed)	Emissions (lb/hr)	PTE (ton/yr)	Emission factor (lb/lb rubber removed)	PTE (ton/yr)	Emission factor (lb/lb rubber removed)	PTE (ton/yr)
EU-01 and EU-02 (Removal stations)	Old rubber removal	6	128115	768690	0.000226	0.020	0.09	0.00266	1.02	0.00215	0.83
EU-06 and EU-07 (Finishing stations)	Trimming	2	128115	256230	0.000226	0.007	0.03	0.00266	0.34	0.00215	0.28
	Grinding	2	128115	256230	0.000226	0.007	0.03	0.00266	0.34	0.00215	0.28
	Polishing	0.1	128115	12811.5	0.000226	0.000	0.00	0.00266	0.02	0.00215	0.01
Total						0.03	0.15		1.72		1.40

Assumptions and methodology

Emission factors from AP-42 Section 4.12, Emissions Factors Tables

<https://www.epa.gov/ttn/chief/ap42/ch04/draft/rel04s12.xls>

Grinding tab, belt grinding emission factor (SCC 30800151)

HAPs: Overall HAP emission factor used to demonstrate low level of HAP emissions; single highest HAP is 1,3 butadiene - approximately 20% of total HAP emissions

Amount of old rubber removed based on 6 pounds of rubber removed from old rollers to be refurbished

For new/refurbished rollers, assume 10 pounds of rubber applied to roller, 2 pounds removed during trimming, 2 pounds removed during grinding, and trace removed during polishing

PTE = amount of rubber removed (lb/roller) * # rollers/year * emission factor (lb pollutant/lb rubber removed) * ton/2000 lb

**Appendix A: Emission Calculations
Wheelabrator Shotblasting Emissions**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Blast material collected in baghouse (lb/shift)	Blast material collected in baghouse (ton/yr)	Baghouse flow rate (acfm)	Baghouse outlet grain loading (gr/acf)	Baghouse outlet emissions (ton/yr)	PM/PM10/PM2.5 (ton/yr)	PM/PM10/PM2.5 emissions (lb/hr)
40	21.9	2630	0.004	0.39	22.29	5.09

Assumptions and Methodology

Blast material collected in baghouse based on historical information. Since most of material collected in baghouse is larger than 100 micron in size, this is a conservative estimate of PM/PM10/PM2.5 emissions

Baghouse flow rate and outlet grain loading based on engineering design estimate

NOTE: The following mass balance information was provided by the source.

Blast material collected in baghouse (ton/yr) = lb/shift * 3 shift/day * 365 day/yr * ton/2000 lb

Baghouse outlet emissions (ton/yr)

= flow rate ft³/min * gr/ft³ * 60 min/hr * 8760 hr/yr * lb/7000 gr * ton/2000 lb

Total PTE = Blast material collected in baghouse + Baghouse outlet emissions

Process Weight rule evaluation

Process weight rate (ton/hr)	Rule 6-3-2 limit (lb/hr)	Uncontrolled PM emissions (lb/hr)	Rule 6-3-2 applies? (uncontrolled PM emissions > 0.551 lb/hr)	Baghouse required to comply? (Uncontrolled lb/h > Rule 6-3-2 limit)
14.25	24.31	5.09	Yes	No

Process weight rate based on engineering design estimate

Rule 6-3-2 limit = 4.10 * (Process weight rate)^{0.67}

Rule 6-3-2 does not apply if uncontrolled PM emissions < 0.551 lb/hr

Control device (baghouse) not required if uncontrolled emission rate < Rule 6-3-2 limit

**Appendix A: Emissions Calculations
Solutioning Table (Primer Adhesive)**

Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann

Primer and adhesive VOC and HAP composition														
Material	Rollers produced	lb per roller	VOC content	Toluene	MIBK	Xylene	Methanol	Trichloroethylene	Ethylbenzene	Phenol	Hexane	p-cresol	Non-HAP VOCs	Solids
L 002-A	2985	0.0133	80.00%	70.00%									10.00%	
L 002-B	2985	0.0133	81.00%	70.00%									11.00%	
L 025	731	0.0679	85.00%			70.00%			10.00%				5.00%	
L 382-A	974	0.0192	95.50%	90.00%									5.50%	10.5-30.5%
L 382-B	974	0.0192	96.00%	90.00%									6.00%	10.5-30.5%
L 607-A	1484	0.0715	75.00%								5.00%		70.00%	1%
L 607-B	1484	0.0715	95.00%								5.00%		90.00%	1%
L 608-A	3626	0.0517	85.00%								5.00%		80.00%	7.50%
L 608-B	3626	0.0517	88.00%								5.00%		83.00%	7.50%
L 790-A	2521	0.0409	91.00%										91.00%	6-11%
L 790-B	2521	0.0409	92.00%										92.00%	1%
A 050	3489	0.079	75.32%		75.00%								75.00%	23-26%
A 100	15525	0.0587	76.00%	24.00%	27.00%								38.00%	15.5-20.5%
A 110	5752	0.0431	73.00%		5.00%		41.00%			1.00%		2.00%	24.00%	32-34%
B 020	11152	0.0434	73.68%			60.00%			15.00%				11.00%	1-5%
B 030	6132	0.0618	76.00%			35.00%		35.00%	10.00%				17.00%	1-5%
B 070	2660	0.0602	78.75%			62.60%			15.70%				4.80%	22.00%

VOC and HAP content from MSDS for each material. Where ranges provided, max value in range used, unless MSDS provided more specific value.

lb/roller determined by annual usage divided by number of rollers produced using that material.

**Appendix A: Emissions Calculations
Solutioning Table (Primer Adhesive)**

Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann

Primer - adhesive application VOC and HAP PTE (lb/yr)													
Material	lb per roller	Max rollers for PTE	VOC	Toluene	MIBK	Xylene	Methanol	Trichloroethylene	Ethylbenzene	Phenol	Hexane	p-cresol	Non-HAP VOCs
L 002-A	0.0133	14,375	152.95	133.83									19.12
L 002-B	0.0133	14,375	154.86	133.83									21.03
L 025	0.0679	3,523	203.33			167.45			23.92				11.96
L 382-A	0.0192	4,689	85.98	81.03									4.95
L 382-B	0.0192	4,689	86.43	81.03									5.40
L 607-A	0.0715	7,149	383.37								25.56		357.81
L 607-B	0.0715	7,149	485.60								25.56		460.04
L 608-A	0.0517	17,462	767.37								45.14		722.23
L 608-B	0.0517	17,462	794.45								45.14		749.31
L 790-A	0.0409	12,132	451.54										451.54
L 790-B	0.0409	12,132	456.50										456.50
A 050	0.079	16,796	999.47		995.16								995.16
A 100	0.0587	74,742	3,334.39	1,052.97	1,184.59								1,667.20
A 110	0.0431	27,686	871.08		59.66		489.24			11.93		23.87	286.38
B 020	0.0434	53,693	1,716.95			1,398.17			349.54				256.33
B 030	0.0618	29,518	1,386.40			638.47		638.47	182.42				310.12
B 070	0.0602	12,812	607.38			482.82			121.09				37.02
Total lb/yr			12,938.05	1,482.69	2,239.41	2,686.91	489.24	638.47	676.97	11.93	141.40	23.87	6,812.10
Total ton/yr			6.47	0.74	1.12	1.34	0.24	0.32	0.34	0.01	0.07	0.01	3.41
Total HAP ton/yr			4.19										

Assumptions and methodology

Max rollers for PTE calculated by applying the ratio of actual rollers produced using the compound to total actual rollers produced (26,612) to the maximum number of rollers produced in a year (128,115).

PTE in lb/yr for each compound = lb/roller * max rollers for PTE * % composition

Total PTE in ton/yr = sum of PTE in lb/year/2000

**Appendix A: Emission Calculations
Solutioning Table (Primer Adhesive)**

Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann

Primer - adhesive application VOC and HAP PTE - MAX VOC Scenario (lb/yr)													
Material	lb per roller	PTE	VOC	Toluene	MIBK	Xylene	Methanol	Trichloroethylene	Ethylbenzene	Phenol	Hexane	p-cresol	Non-HAP VOCs
L 607-A	0.0715	128,115	6,870.17								458.01		6,412.16
L 607-B	0.0715	128,115	8,702.21								458.01		8,244.20
Total lb/yr			15,572.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	916.02	0.00	14,656.36
Total ton/yr			7.79	0	0	0	0	0	0	0	0.46	0	7.33
Total HAP ton/yr			0.46										

Assumptions and methodology

Max VOC scenario based on using highest VOC combination of materials at full capacity (128,115 rollers)

PTE in lb/yr for each compound = lb/roller * max rollers for PTE * % composition

Total PTE in ton/yr = sum of PTE in lb/year/2000

Primer - adhesive application VOC and HAP PTE - MAX Individual HAP Scenario (lb/yr)													
Material	lb per roller	PTE	VOC	Toluene	MIBK	Xylene	Methanol	Trichloroethylene	Ethylbenzene	Phenol	Hexane	p-cresol	Non-HAP VOCs
A 050	0.079	128,115	7,623.67		7,590.81								7,590.81
Total lb/yr			7,623.67	0.00	7,590.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,590.81
Total ton/yr			3.81	0	3.8	0	0	0	0	0	0	0	3.8
Total HAP ton/yr			3.8										

Assumptions and methodology

Max Individual HAP scenario based on using highest individual HAP by weight at full capacity (128,115 rollers)

PTE in lb/yr for each compound = lb/roller * max rollers for PTE * % composition

Total PTE in ton/yr = sum of PTE in lb/year/2000

**Appendix A: Emissions Calculations
Vulcanizer Autoclave Emissions (EU0-5)**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Process	Amount of rubber per roller (lb/roller)	Rollers/ year	Rubber vulcanized (lb/year)	VOC emission factor (lb/lb rubber)	VOC PTE (tons/year)	HAP emission factor (lb/lb rubber)	All HAP PTE (ton/yr)	Carbon disulfide emission factor (lb/lb rubber)	Carbon disulfide PTE
Vulcanizer autoclave	10	128,115	1,281,150	0.00615	3.94	0.00604	3.87	0.00593	3.80

Assumptions and methodology

Emission factors from AP-42 Section 4.12, Emissions Factors Tables

<https://www.epa.gov/ttn/chief/ap42/ch04/draft/rel04s12.xls>

Autoclave tab, Compound 8 emission factors

HAPs: Overall HAP emission factor used to demonstrate low level of HAP emissions. Carbon disulfide comprises 98% of HAP emissions

Assume 10 pounds of rubber per new/refurbished roller put into autoclave

PTE = amount of rubber removed (lb/roller) * # rollers/year * emission factor (lb pollutant/lb rubber removed) * ton/2000 lb

**Appendix A: Emissions Calculations
Flexographic Sleeve Make-Up Emissions (VOC)**

Company Name: **Bottcher American Corporation**
Source Address: **717 W Industrial Dr., Tipton, IN 46072**
Permit Number: **159-47853-00015**
Reviewer: **Sarah Germann**

Materials (EU-09)	Sleeve production capacity (sleeves/shift)	Max sleeves produced (year)	Material usage per sleeve (grams)	% lost	Potential emissions (lb/day)	PTE (ton/yr)
Aradur (Hardener)	24	26,280	150	0.80%	0.19	0.03
Araldite LY 1564 SP US (Epoxy)	24	26,280	600	0.80%	0.76	0.14
TOTAL						0.17

Assumptions

Material usage per sleeve based on conservative estimate of hardener and epoxy applied to a mandrill for sleeve production
% lost to evaporation based on lab trial of 600 g/150 g recipe. Hardener and epoxy react to form solid material. In laboratory trial, the material mass lost was 6 g (0.8%)

Methodology

Potential emissions (lb/day) = Sleeves/shift * 3 shift/day material used sleeve (g) * lb/453.6 g 0.8 % lost
PTE (ton/yr) = lb/day * 365 * ton/2000 lb

**Appendix A: Emissions Calculations
Polyurethane roller processing**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Process	Material removed per roller (lb)	Rollers per year	lb material removed/yr	PM/PM10/PM2.5			VOC		
				Emission factor (lb/lb material removed)	Emissions (lb/hr)	PTE (ton/yr)	Emission factor (lb/lb material removed)	PTE (ton/yr)	
Old polyurethane removal	70	10,950	766,500	0.000226	0.020	0.09	0.00266	1.02	
Trimming	15	10,950	164,250	0.000226	0.004	0.0186	0.00266	0.22	
Grinding	15	10,950	164,250	0.000226	0.004	0.0186	0.00266	0.22	
Polishing	0.1	10,950	1,095	0.000226	0.000	0.0001	0.00266	0.00	
Total						0.13		1.46	

Assumptions and methodology

Emission factors from AP-42 Section 4.12, Emissions Factors Tables for PM and VOC. HAPs factors not used since polyurethane is a polymer, not rubber
<https://www.epa.gov/sites/default/files/2020-10/re104s12.xls>

For polyurethane removal from existing polyurethane rollers, assume 6 pounds of material per old roller.

For new polyurethane rollers, assume 10 pounds of material per unfinished roller, 2 pounds removed during trimming, 2 pounds removed during grinding, and trace removed during polishing

PTE = amount of polyurethane removed (lb/roller) * # rollers/year * emission factor (lb pollutant/lb rubber removed) * ton/2000 lb

**Appendix A: Emissions Calculations
Polyurethane adhesive**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Material	Maximum rollers produced per year	Adhesive used per roller (gal/roller)	Adhesive specific gravity	Adhesive density (lb/gal)	Adhesive VOC content	VOC content (lb/gal)	VOC PTE (ton/yr)	Adhesive toluene content	Toluene content (lb/gal)	Toluene PTE (ton/yr)
Thixon 423 Blue	9,122	0.1	0.936	7.81	77.00%	6.01	2.74	8.00%	0.62	0.28
Thixon 423 Clear	1,828	0.1	0.936	7.81	77.00%	6.01	0.55	8.00%	0.62	0.06
							3.29			0.34

Assumptions and methodology

VOC and HAP content from MSDS for each material. Where ranges provided, max value in range used, unless MSDS provided more specific value.
Adhesive used per roller based on usage divided by number of rollers produced using that material.

PTE in ton/yr for each compound = gal/roller * rollers produced * VOC/HAP content lb/gal * ton/2000 lb

Appendix A: Emissions Calculations
Natural Gas Combustion (≤ 100 MMBtu/hr)

Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.40	1020	12.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.05	0.05	0.00	0.60	0.03	0.50

*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.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu; MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.3E-05	7.2E-06	4.5E-04	1.1E-02	2.0E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.0E-06	6.6E-06	8.4E-06	2.3E-06	1.3E-05

Potential Emission of Combined HAPs (tons/yr)		1.1E-02
Potential Emission of Highest Single HAP (tons/yr)		1.1E-02 Hexane

Methodology

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Vehicle Traffic on Paved Roads**

**Company Name: Bottcher American Corporation
Source Address: 717 W Industrial Dr., Tipton, IN 46072
Permit Number: 159-47853-00015
Reviewer: Sarah Germann**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Material delivery truck (entering plant with load)	15.0	1.0	15.0	40.0	600.0	550	0.104	1.6	570.3
Material delivery truck (leaving plant with no load)	15.0	1.0	15.0	15.0	225.0	550	0.104	1.6	570.3
Delivery/Distribution (entering plant with no load)	15.0	1.0	15.0	15.0	225.0	550	0.104	1.6	570.3
Delivery/Distribution (leaving plant with full load)	15.0	1.0	15.0	40.0	600.0	550	0.104	1.6	570.3
Totals			60.0		1650.0			6.3	2281.3

Vehicle and weight information estimated by House of Fara

Average Vehicle Weight Per Trip =

27.5

 tons/trip
Average Miles Per Trip =

0.10

 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.5	27.5	27.5	tons = average vehicle weight
sL =	7.4	7.4	7.4	g/m ² = mean silt loading value for municipal solid waste landfill - AP-42 Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.998	0.400	0.0981	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.827	0.365	0.0897	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Material delivery truck (entering plant with load)	0.57	0.11	0.03	0.52	0.10	0.03
Material delivery truck (leaving plant with no load)	0.57	0.11	0.03	0.52	0.10	0.03
Delivery/Distribution (entering plant with no load)	0.57	0.11	0.03	0.52	0.10	0.03
Delivery/Distribution (leaving plant with full load)	0.57	0.11	0.03	0.52	0.10	0.03
Totals	2.28	0.46	0.11	2.08	0.42	0.10

Note:

The potential to emit calculations submitted with the application for Registration R159-37288-00015 used a mean silt loading value of 1.1 g/m² for wet corn milling facilities from AP-42 Table 13.2.1-1. The source's consultant has stated that there are no materials stored outside in external piles and that vehicles coming to the site are traditional, enclosed semi trailers, and that there is nothing at the site that which contributes to silt loading levels beyond the ubiquitous contributors such as asphalt or concrete deterioration over time. The IDEM, OAQ cannot justify the use of a silt loading for wet corn milling for Bottcher America Corporation without actual analysis of the source's silt loading, but has conservatively accepted the use of the mean silt loading value for municipal solid waste landfills.

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Kerry Jackson
Bottcher America Corporation
717 W Industrial Dr
Tipton, IN 46072

DATE: June 27, 2024

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

SUBJECT: Final Decision
Registration Administrative Amendment
159-47853-00015

This notice is to inform you that a final decision has been issued for the air permit application referenced above.

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. In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List and, if applicable, the Consultant/Agent and/or Responsible Official/Authorized Individual.

The final decision and supporting materials are available electronically; the original signature page is enclosed for your convenience. The final decision and supporting materials available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option **by Permit Number**, then enter permit 47853

and

IDEM's Virtual File Cabinet (VFC): <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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, or have difficulty accessing the documents online, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover Letter 8/20/20-acces via website



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024
Bottcher America Corporation
159-47853-00015

To: Interested Parties

This notice is to inform you that a final decision has been issued for the air permit application referenced above. This notice is for informational purposes only. You are not required to take any action.

You are receiving this notice because you asked to be on IDEM's notification list for this company and/or county; or because your property is nearby the company being permitted; or because you represent a local/regional government entity.

The enclosed Notice of Decision Letter provides additional information about the final permit decision.

The final decision and supporting materials are available electronically at:

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by Permit Number, then enter permit 47853

and


IDEM's Virtual File Cabinet (VFC): <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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit.

Please Note: *If you 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
Final Interested Parties Cover Letter 10/13/2023

Mail Code 61-53

IDEM Staff	JLSCOTT 06/27/2024 Bottcher America Corporation 159-47853-00015 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Kerry Jackson Bottcher America Corporation 717 W Industrial Dr Tipton IN 46072 (Source CAATS) via UPS										
2		Shelly & J Acres 10998 Golden Bear Way Noblesville IN 46060 (Affected Party)										
3		Ms. Jane Harper 285 W 100 N Tipton IN 46072 (Affected Party)										
4		Tipton County Commissioners 101 E Jefferson St Tipton IN 46072 (Local Official)										
5		Tipton County Health Department 101 E Jefferson St, 1st Floor Tipton IN 46072 (Health Department)										
6		Bernard Paul B Paul Consulting LLC 285 Spring Dr Zionsville IN 46077 (Consultant)										
7		Tipton Mayors Office 216 S Main St Tipton IN 46072 (Local Official)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	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 mil 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 inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--