



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

To: Interested Parties

Date: February 10, 2017

From: Matthew Stuckey, Chief
Permits Branch
Office of Air Quality

Source Name: Nishikawa Cooper LLC

Permit Level: Title V Administrative Amendment

Permit Number: 087-37999-00031

Source Location: 324 Morrow Street
Topeka, Indiana

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, select Search option 3, then enter permit 37999.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

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, Suite N 501E, 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.



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Michael Hough
Nishikawa Cooper LLC
324 Morrow Street
Topeka, IN 46571

February 10, 2017

Re: 087-37999-00031
Administrative Amendment to
Part 70 Renewal T087-36530-00031

Dear Michael Hough:

Nishikawa Cooper LLC was issued a Part 70 Permit Renewal No. T087-36530-00031 on July 13, 2016 for a stationary extruded rubber seals manufacturing source located at 324 Morrow Street, Topeka, IN 46571. On December 16, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to add in one (1) rubber extruder and the construction and operation of an insignificant activity consisting of one (1) research and development laboratory. The addition of one extruder to SDM Line 4 takes the total number of extruders for this line from 4 to 5 extruders.

Pursuant to the provisions of 326 IAC 2-7-11(a), the permit is hereby administratively amended as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as amended. The permit references Attachment A, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP), 40 CFR 63, Subpart ZZZZ. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this amendment:

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl. A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nicholas Eilerman of my staff, at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A
IC/NI

cc: File - LaGrange County
LaGrange County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Governor

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Commissioner

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Nishikawa Cooper LLC
324 Morrow Street
Topeka, Indiana 46571

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

Table with 2 columns: Issuance/Expiration Date and Issued by/Issued by details. Row 1: Operation Permit No.: T087-36530-00031. Row 2: Issuance Date: July 13, 2016; Issued by: Iryn Calilung, Section Chief, Permits Branch, Office of Air Quality. Row 3: Expiration Date: July 13, 2021.

Table with 2 columns: Issuance/Expiration Date and Issued by/Issued by details. Row 1: Administrative Amendment No.: T087-37999-00031. Row 2: Issuance Date: February 10, 2017; Issued by: Iryn Calilung, Section Chief, Permits Branch, Office of Air Quality. Row 3: Expiration Date: July 13, 2021.

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Attachment A - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP), 40 CFR 63, Subpart ZZZZ

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)]

The Permittee owns and operates a stationary molded, extruded, and lathe-cut mechanical rubber goods manufacturing plant.

Source Address:	324 Morrow Street, Topeka, Indiana 46571
General Source Phone Number:	260-593-2156
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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:

- (a) CV Line 5, identified as CV-5, consisting of the following equipment:
- (1) Two (2) extruders, collectively identified as CV-5Ex, constructed in 1989, with a combined nominal capacity of 400 pounds of rubber per hour, equipped with strip feeders, no duster, no control and exhausting to general ventilation.
 - (2) One (1) natural gas-fired rubber and coating curing oven, identified as CV-5C, with a nominal heat input capacity of 1.59 MMBtu/hr, exhausting to stack CV-5, S-1.
 - (3) Two (2) exhaust hoods for ventilation of extrusion line (CV-5Ex), identified as CV-5EH1 and CV-5EH2, exhausting to stacks CV-5, S-2, and CV-5, S-3, respectively.
 - (4) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit CV-5SB, constructed in 2000, equipped with six (6) airless high-volume low-pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as CV-5, S-4, with a combined nominal capacity of 0.93 gallons of waterborne urethane coating per hour.
- (b) CV Line 6, identified as CV-6, consisting of the following equipment:
- (1) One (1) extruder, identified as CV-6Ex, constructed in 1989, with a nominal capacity of 400 pounds of rubber per hour, equipped with strip feeders, no duster, no control, and exhausting to general ventilation.

- (2) One (1) microwave curing oven, identified as CV-6C2, and exhausting to CV-6, S-2.
 - (3) One (1) natural gas-fired rubber and coating curing oven, identified as CV-6C1, with a nominal heat input capacity of 1.59 MMBtu/hr, exhausting to stack CV-6, S-1.
 - (4) Two (2) exhaust hoods for ventilation of extrusion line (CV-6Ex), identified as CV-6EH1 and CV-6EH2, CV-6EH1 exhausting to stack CV-5, S-2, and CV-6EH2, exhausting to stacks CV-6, S-2, and CV-5, S-3.
 - (5) One (1) Line 6 spray booth, identified as CV-6SB, constructed in 2000, equipped with six (6) airless high-volume low-pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as CV-6, S-3, with a combined nominal capacity of 0.93 gallons of waterborne urethane coating per hour.
- (c) CV Line 7, identified as CV-7, consisting of the following equipment:
- (1) Three (3) extruders, collectively identified as CV-7Ex, constructed in 1991, with a combined nominal capacity of 600 of rubber pounds per hour, no duster, no control, exhausting to general ventilation.
 - (2) One (1) natural gas-fired rubber and coating curing oven, identified as CV-C, with a nominal heat input capacity of 1.59 MMBtu/hr, exhausting to stack CV-7, S-1.
 - (3) One (1) exhaust hood for ventilation of extrusion line (CV-7Ex), identified as CV-7EH, exhausting to stack CV-6, S-2.
 - (4) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as CV-7SB, constructed in 2001, with a combined nominal capacity of 1.36 gallons of waterborne coating per hour, equipped with two (2) spray guns and dry filters, and exhausting to stack CV-7, S-2.
- (d) CV Line 8, identified as CV-8, consisting of the following equipment:
- (1) Four (4) extruders, collectively identified as CV-8Ex, constructed in 1995, with a combined nominal capacity of 400 pounds of rubber per hour, equipped with four (4) strip feeders, no duster, no control, and exhausting to general ventilation.
 - (2) One (1) natural gas-fired rubber vulcanizing oven, identified as CV-8C1, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stacks CV-8, S-1, CV-8, S-2, CV-8, S-3.
 - (3) Two (2) exhaust hoods for ventilation of extrusion line (CV-8Ex), identified as CV-8EH1 and CV-8EH2, both exhausting to stack CV-8, S-4.
 - (4) One (1) natural gas fired coating curing oven, identified as CV-8C2, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stack CV-8, S-4.
 - (5) One (1) urethane application spray booth, identified as CV-8SB, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, with a nominal capacity of 10 grams of coating per minute per gun, and exhausting to stack CV-8, S-5.

- (e) CV Line 9, identified as CV-9, consisting of the following equipment:
- (1) Two (2) extruders, collectively identified as CV-9Ex, constructed in 1995, with a combined nominal capacity of 400 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (2) One (1) natural gas fired rubber curing oven, identified as CV-9C1, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stack CV-9, S-1.
 - (3) One (1) urethane application line, identified as CV-9Ex, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, with a nominal capacity of 10 grams of coating per minute per gun, and exhausting to stack CV-9, S-5.
 - (4) One (1) natural gas fired coating curing oven with two (2) heat exchangers, identified as CV-9C2, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stacks CV-9, S-2 and CV-9, S-3.
 - (5) One (1) exhaust hood for ventilation of extrusion line (CV-9Ex), identified as CV-9EH, and exhausting to stack CV-9, S-4.
- (f) CV Line 10, identified as CV-10, consisting of the following equipment:
- (1) Three (3) extruders, collectively identified as CV-10Ex, with a combined nominal capacity of 750 pounds of rubber per hour, constructed in 2004, no duster, no control, and exhausting to general ventilation.
 - (2) Two (2) natural gas-fired microwave curing ovens, identified as CV-10C1, with a nominal heat input capacity of 0.15 MMBtu/hr each, and exhausting to stack CV-10, S-1.
 - (3) Four (4) natural gas-fired rubber curing ovens, identified as CV-10C2, constructed in 2015, each with a nominal heat input capacity of 0.2 MMBtu/hr, and exhausting to stacks CV-10, S-1 and S-2.
 - (4) One (1) exhaust hood for ventilation of extrusion line (CV-10Ex), identified as CV-10EH, and exhausting to stack CV-10, S-3.
 - (5) One (1) spray booth, identified as CV-10SB1, constructed in 2004, equipped with four (4) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-10, S-5.
 - (6) One (1) spray booth, identified as CV-10SB2, constructed in 2004, equipped with four (4) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-10, S-6.
 - (7) Two (2) infrared coating curing ovens, identified as CV-10C3 and CV-10C4, exhausting to general ventilation.
 - (8) One (1) plasma arc generator, consisting of one (1) electric generator, with a nominal capacity of 1.2 kilowatt hours, exhausting to stack CV-10, S-1.

- (g) CV Line 11, identified as CV-11, consisting of the following equipment:
- (1) Four (4) extruders, collectively identified as CV-11Ex, constructed in 1987 and modified in 2008, with a combined nominal capacity of 200 pounds of rubber per hour, equipped with, four (4) strip feeders and one (1) talc applying duster, no control, and exhausting to general ventilation.
 - (2) One (1) electric microwave rubber curing oven, identified as CV-11C1, and exhausting to stack CV-11, S-1.
 - (3) One (1) natural gas rubber curing oven, identified as CV-11C2, with a nominal heat input capacity of 0.5 MMBtu/hr, and exhausting to stacks CV-11, S-1 and CV-11, S-2.
 - (4) Two (2) exhaust hoods for ventilation of extrusion line (CV-11Ex), identified as CV-11EH1 and CV-11EH2, and exhausting to stacks CV-11, S-2 and CV-11, S-1, respectively.
 - (5) One (1) spray booth, identified as CV-11Ex, constructed in 2000, and modified in 2008 and in 2014, equipped with five (5) high-volume low-pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-11 S-3.
 - (6) One (1) natural gas coating curing oven, identified as CV-11C3, with a nominal heat input capacity of 0.5 MMBtu/hr, and exhausting to stacks CV-11, S-1 and CV-11, S-2.
- (h) One (1) CV Line 12, identified as CV-12, constructed 2015, consisting of the following equipment:
- (1) Four (4) extruders, collectively identified as CV-12Ex1 through CV-12Ex4, with a combined nominal capacity of 1,300 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (2) Six (6) natural gas rubber curing ovens, identified as CV-12C1 through CV-12C6, with a combined nominal heat input capacity of 4.54 MMBtu/hr, and nominal capacity of 1,300 pounds of rubber per hour, no control, and exhausting to stacks CV-12C1 S1 through CV-12C1 S6, respectively.
 - (3) One (1) plasma treat operation, with a nominal capacity of 1,300 pounds of rubber per hour, no control, and exhausting to general ventilation.
 - (4) One (1) spray booth, identified as CV-12Ex, equipped with eight (8) high-volume low-pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-12Ex S-1.
- (i) One (1) SDM Line 1 (EA), identified as SDM-1, constructed 2015, consisting of the following equipment:
- (1) One (1) core metal heater, identified as SDM-1MH, with two (2) natural gas-fired burners with a nominal heat input rate of 0.375 MMBtu/hr.
 - (2) Five (5) extruders, collectively identified as SDM-1Ex, four (4) constructed in 2004 and one (1) constructed in 2015, with a combined nominal capacity of 1342

- pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
- (3) Two (2) natural gas-fired microwave curing ovens, identified as SDM-1C1 and SDM-1C2, with a nominal heat input rate 0.143 MMBtu/hr each, exhausting to stack SDM-1, S-1.
 - (4) One (1) natural gas-fired rubber curing oven, identified as SDM-C3, with two (2) burners with a nominal heat input rate of 0.850 MMBtu/hr each, exhausting to stack SDM-1, S-2.
 - (5) One (1) electric plasma arc generator, identified as SDM-1PI, exhausting to stack SDM-1, S-3.
 - (6) One (1) spray booth, identified as SDM-1SB, constructed in 2004, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, and exhausting to stack SDM-1, S-5.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-1, C4, with two burners nominally rated at 0.340 MMBtu/hr each, and exhausting to stack SDM-1, S-4.
- (j) SDM Line 2 (EB), identified as SDM-2, constructed in 2013, consisting of the following equipment:
- (1) One (1) core metal heater, identified as SDM-2MH, with two (2) natural gas-fired burners with a combined nominal heat input rate of 0.375 MMBtu/hr.
 - (2) Four (4) extruders, collectively identified as SDM-2Ex, with a combined nominal capacity of 1289 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (3) Two (2) natural gas-fired microwave curing ovens, identified as SDM-2C1 and SDM-2C2, with a nominal heat input rate 0.143 MMBtu/hr each, exhausting to stack SDM-2, S-1.
 - (4) One (1) natural gas-fired rubber curing oven, identified as SDM-2C3, with three (3) burners, with a nominal heat input rate of 0.850 MMBtu/hr each, exhausting to stack SDM-2, S-2.
 - (5) One (1) electric plasma arc generator, identified as SDM-2PI, exhausting to stack SDM-2, S-3.
 - (6) One (1) Coating Booth IR Electric Pre-Heater with one (1) burner.
 - (7) One (1) spray booth, identified as SDM-2SB, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, exhausting to stack SDM-2, S-4.
 - (8) One (1) natural gas-fired coating cure oven, identified as SDM-2, C4, with two burners nominally rated at 0.340 MMBtu/hr each, and exhausting to stack SDM-2, S-5.

- (k) SDM Line 3 (EC), identified as SDM-3, consisting of the following equipment:
- (1) One (1) natural gas-fired core metal heater, identified as SDM-3MH, with a nominal heat input capacity of 1.19 MMBtu/hr, and exhausting to general ventilation.
 - (2) Three (3) extruders, collectively identified as SDM-3Ex, constructed in 1994, with a combined nominal capacity of 400 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (3) One (1) natural gas-fired bead type rubber curing over and deodorizing furnace, identified as SDM-3C1, with a nominal heat input capacity of 1.99 MMBtu/hr, and exhausting to stacks SDM, S-2, SDM-3, S-3 and SDM-3, S-4.
 - (4) One (1) electric plasma arc generator, identified as SDM-3PI, exhausting to stack SDM-3, S-8.
 - (5) One (1) bead recovery/dryer system, identified as SDM-3, exhausting to stack SDM-3, S-5.
 - (6) One (1) SDM EC urethane application spray booth, identified as SDM-3SB, constructed in 1996 and modified in 2015 to add one (1) spray gun, equipped with total four (4) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, equipped with dry filters for particulate control and exhausting to stack SDM-3, S-7.
 - (7) One (1) natural gas-fired curing oven, identified as SDM-3C2, with a nominal heat input capacity of 1.0 MMBtu/hr, and exhausting to stack SDM-3, S-6.
- (l) SDM Line 4 (ED), identified as SDM-4, consisting of the following equipment:
- (1) One (1) core metal heater, identified as SDM-4MH, with two (2) natural gas-fired burners, each has a nominal heat input capacity of 0.375 million British thermal unit per hour, and exhausting to stack SDM-4, S-1.
 - (2) Five (5) extruders, collectively identified as SDM-4Ex, four (4) constructed in 2002 and one (1) constructed in 2016, with a combined nominal capacity of 1611.25 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (3) Two (2) natural gas-fired microwave rubber curing ovens, identified as SDM-4C1, each with a nominal heat input capacity of 0.143 MMBtu/hr, and both exhausting to stack SDM-4, S-2.
 - (4) One (1) natural gas-fired curing oven, identified as SDM-4C2, with two (2) burners, each with a nominal heat input capacity of 0.850 MMBtu/hr, and exhausting to stack SDM-4, S-3.
 - (5) One (1) electric plasma arc unit, identified as SDM-4PI, exhausting to stack SDM-4, S-4.
 - (6) One (1) spray booth, identified as SDM-4SB, constructed in 2002, equipped with six (6) High-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, exhausting to stack SDM-4, S-6.

- (7) One (1) natural gas-fired coating cure oven, identified as SDM-4C3, with two burners each having a nominal heat input capacity of 0.34 MMBtu/hr, and exhausting to stack SDM-4, S-5.
- (m) SDM Line 5 (EE), identified as SDM-5, consisting of the following equipment:
- (1) One (1) core metal heater, identified as SDM-5MH, with (2) natural gas-fired burners with a nominal heat input capacity of 0.375 MMBtu/hr each.
 - (2) Four (4) extruders, collectively identified as SDM-5Ex, constructed in 2002, with a combined capacity of 1289 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (3) Two (2) natural gas-fired microwave curing ovens, identified as SDM-5C1, with a nominal heat input capacity of 0.143 MMBtu/hr each, exhausting to stack SDM-5, S-1.
 - (4) One (1) natural gas-fired rubber curing ovens, identified as SDM-5C2, with two (2) burners, each having a nominal heat input capacity of 0.850 MMBtu/hr, exhausting to stack SDM-5, S-2.
 - (5) One (1) electric plasma arc unit, identified as SDM-5PI, and exhausting to stack SDM-5, S-3.
 - (6) One (1) spray line, identified as SDM-5SB, constructed in 2002, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls, with a nominal capacity of 10 grams per minute of coating per gun, and exhausting to stack SDM-5, S-5.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-5C3, with two (2) burners, each having a nominal heat input capacity of 0.340 MMBtu/hr, exhausting to stacks SDM-5, S-4.
- (n) L-Coat Extrusion Line, identified as LC-1, consisting of the following equipment:
- (1) Two (2) plastic extruders, collectively identified as LC-1Ex, constructed in 2006, with a nominal capacity of 19.0 pounds per hour each, no control, and exhausting to general ventilation.
 - (2) Two (2) rubber extruders, collectively identified as LC-1Ex, constructed in 2006, with a nominal capacity of 447.0 pounds per hour each, no duster, no control, and exhausting to general ventilation.
 - (3) One (1) natural gas curing oven, identified as LC-1C1, exhausting to stacks LC, S-1, LC, S-2, and LC, S-3, consisting of the following burners:
 - (A) Four (4) natural gas-fired burners, constructed in 2006, with a nominal heat input capacity of 0.782 MMBtu/hr each.
 - (B) Four (4) natural gas-fired burners, constructed in 2007, with a nominal heat input capacity of 0.782 MMBtu/hr each.
 - (4) Three (3) exhaust hoods for ventilation of extrusion line (LC-1Ex), identified as LC-1EH1, LC-1EH2, and LC-1EH3, and exhausting to LC, S-4, LC, S-5, and LC, S-6, respectively.

- (5) One (1) plasma arc unit, identified as LC-1PI, exhausting to stack LC, S-7.
- (6) One (1) L-Coat Glassline Spray Booth coating extruded rubber parts, identified as LC-1SB1, constructed in 2006, utilizing seven (7) high-volume low-pressure (HVLP) spray guns with a combined nominal capacity of 1.005 gallon of coating per hour and particulate emissions controlled by dry filters, and exhausting to stack LC, S-9.
- (7) One (1) L-Coat Glassline Spray Booth coating extruded rubber parts, identified as LC-1SB2, constructed in 2007, utilizing seven (7) high-volume low-pressure (HVLP) spray guns with a combined nominal capacity of 1.005 gallon of coating per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack LC, S-10.
- (8) One (1) natural gas coating curing oven, identified as LC-1C2, consisting of six (6) natural gas-fired burners with a nominal heat input capacity of 0.086 MMBtu/hr each, and exhausting to stack LC, S-8.
- (o) One (1) off line finishing spray booth coating extruded rubber parts, identified as F-1, constructed in 2007 and modified in 2009, with a nominal capacity of 10 grams of coating per minute, exhausting at stack F-1, S-1 with an associated primer station where primer is applied by hand.
- (p) One (1) off line finishing spray booth coating extruded rubber parts, identified as F-2, constructed in 2007, with a nominal capacity of 10 grams of coating per minute, exhausting at stack F-2, S-1.
- (q) One (1) off line finishing spray booth coating extruded rubber parts, identified as F-3, constructed in 2007, with a nominal capacity of 10 grams of coating per minute, exhausting at stack F-3, S-1.
- (r) One (1) off line finishing spray booth coating extruded rubber parts, identified as F-4, constructed in 2009, with a nominal capacity of 10 grams of coating per minute, exhausting to stack F-4, S-1.
- (s) One (1) rubber extrusion line, identified as DHS, constructed in 2013, and consisting of the following equipment:
 - (1) Two (2) rubber extruders, identified as DHS-EX1 and DHS-EX2, with a combined nominal capacity of 352 pounds of rubber per hour; no duster, no control, and exhausting to general ventilation.
 - (2) One (1) natural gas-fired cure oven, with a nominal heat input capacity of 1.188 MMBtu/hr, and exhausting to one (1) stack;
 - (3) Three (3) exhaust hoods for ventilation of extrusion lines (DHS-EX1 and DHS-EX2) exhausting to one (1) stack; and
 - (4) One (1) ink jet printer with a nominal throughput of 69 gallons of ink per year.
- (t) One (1) rubber extrusion line, identified as CV-13, constructed in 2015, consisting of:
 - (1) Four (4) rubber extruders, identified as CV-13Ex1 through CV-13Ex4, with a combined nominal capacity of 1,300 pounds of rubber per hour, no duster, without control, exhausting inside.

- (2) Six (6) natural gas-fired rubber curing ovens, identified as CV-13C1 through CV-13C6, with a combined nominal capacity of 4.51 MMBtu/hour and 1,300 pounds of rubber per hour, without control and exhausting through stacks S-1 through S-6, respectively.
- (3) One (1) plasma treat operation, with a nominal capacity of 1,300 pounds of rubber per hour, without control and exhausting inside.
- (4) One (1) spray booth, identified as CV-13Ex, equipped with eight (8) high volume low pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, equipped with dry filters for particulate control and exhausting to stack CV-13Ex1 S-1.
- (u) One (1) hand wiping operation, constructed in 2015, with a nominal capacity of 0.763 pounds per hour, without control and exhausting inside.

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 as defined in 326 IAC 2-7-1(21):

- (a) Dango Mixing Mills B and F, each with a dispersion system, exhausting to mixing baghouse, identified as Mix, independently used from specific lines.
- (b) Color Mixing Mill independently used from specific lines.
- (c) Mold Tech Repair Sandblast Unit independently used from specific lines.
- (d) Mold Tech Repair Weld and Metalworking Equipment independently used from specific lines.
- (e) Dango Barwell Extruders independently used from specific lines.
- (f) Polymer Block Cutting Station independently used from specific lines.
- (g) Scrap Cardboard Bailing Unit independently used from specific lines.
- (h) Weld Shop Equipment independently used from specific lines.
- (i) Silicone Coating Mixing Station independently used from specific lines.
- (j) Die Room Metalworking Equipment independently used from specific lines.
- (k) SDM Mezzanine Units independently used from specific lines.
- (l) Barwell Warm-Up Mill independently used from specific lines.
- (m) One (1) emergency generator nominally rated at 54 HP, burning natural gas, installed in December 2008 and manufactured in 2008.

This emergency generator is a new affected source under 40 CFR 63, Subpart ZZZZ.
[40 CFR 63, Subpart ZZZZ]

- (n) Four (4) Rubber Extruders, collectively identified as LC-1Ex, constructed in 2012, with a combined nominal capacity of 1289 pounds per hour, and exhausting to general ventilation.
- (o) Two (2) natural gas-fired microwaves, identified as LC-1MW1 and LC-1MW2, constructed in 2012, exhausting to stack LC-S-1, each consisting of two burners with a nominal heat input of 0.205 MMBtu/Hour each.
- (p) One (1) hand wipe and brush application, identified as F-5, constructed in 2012, with a nominal capacity of 0.05 gallons of coating per day, equipped with an IR curing system, exhausting to general ventilation.
- (q) Two (2) plastic extrusion lines, constructed in 2013 and 2015 with modification, with a combined nominal capacity of 602 pounds of plastic per hour, no control, exhausting to general ventilation, and consisting of the following equipment:
 - (1) Nine (9) plastic extruders for both lines combined, with eight (8) plastic extruders constructed in 2013, with a combined nominal capacity of 342 pounds of plastic per hour and one (1) plastic extruder, constructed in 2015, with a nominal capacity of 260 pounds of plastic per hour;
 - (2) Eight (8) electric dryers for both lines combined, constructed in 2013;
 - (3) Two (2) rinse tanks, using a non VOC/HAP rinse agent, constructed in 2013;
 - (4) Two (2) pull rolls, constructed in 2013;
 - (5) Two (2) laser printers for both lines combined, constructed in 2013; and
 - (6) Two (2) notchers for both lines combined, constructed in 2013.

The plastic extruded in these 2 lines does not undergo curing.
- (r) One (1) annealing line, constructed in 2013, consisting of two (2) natural gas-fired ovens, each with a nominal heat input capacity of 0.5 MMBtu/hr, and exhausting to the outdoors.
- (s) One (1) hand wiping operation, constructed in 2013, with a nominal solvent usage of 58.65 gallons per year, applying an anti-splitting mixture to rubber seals by hand, uncontrolled, and exhausting to the indoors. This type of operation is performed in various locations throughout the facility.
- (t) One (1) Off Line Primer Downdraft Table, identified as F-3-1, constructed in 2014, using a spray application to prime rubber, with a nominal capacity of 1.5 grams of coating per unit and a throughput of 4.40 parts per hour, using no control, exhausting to the general ventilation.
- (u) One (1) coating booth, identified as TG7-1, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-1S-1.
- (v) One (1) coating booth, identified as TG7-2, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control and exhausting to stack TG7-2S-2.

- (w) One (1) coating booth, identified as TG7-3, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-3S-3.
- (x) One (1) coating booth, identified as TG7-4, permitted in 2014, equipped with three (3) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-4S-4.
- (y) One (1) coating booth, identified as TG7-5, permitted in 2014, equipped with three (3) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-5S-5.
- (z) One (1) mixing department, identified as Mix-1, constructed in 1987, equipped with one (1) carbon black weigh station and one (1) raw chemical weigh station, both exhausting to a small baghouse identified as Mix-1, S-1, with a nominal capacity of 605 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.
- (aa) One (1) research and development laboratory as defined in 326 IAC 2-7-1(21)(D) and (E).

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, T087-36530-00031, 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:
- (1) 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 V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require 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 or Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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) A description of the emergency;

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(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 reissued. 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 T087-36530-00031 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]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision 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.
- (b) 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.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, 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 317-233-4230 (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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.8 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) For new units:

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

- (b) For existing units:

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

extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.11 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.12 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.13 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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

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

C.15 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 2-7-5(3)] [326 IAC 2-7-19]

C.16 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]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (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.

- (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.19 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) CV Line 5, identified as CV-5, consisting of the following equipment:
 - (4) One (1) Line 5 spray booth coating extruded rubber parts, identified as emission unit CV-5SB, constructed in 2000, equipped with six (6) airless high-volume low-pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as CV-5, S-4, with a combined nominal capacity of 0.93 gallons of waterborne urethane coating per hour.
- (b) CV Line 6, identified as CV-6, consisting of the following equipment:
 - (5) One (1) Line 6 spray booth, identified as CV-6SB, constructed in 2000, equipped with six (6) airless high-volume low-pressure (HVLP) guns coating extruded rubber parts, using dry filters as control, and exhausting to one (1) stack identified as CV-6, S-3, with a combined nominal capacity of 0.93 gallons of waterborne urethane coating per hour.
- (c) CV Line 7, identified as CV-7, consisting of the following equipment:
 - (4) One (1) Line 7 waterborne urethane coating booth coating extruded rubber parts, identified as CV-7SB, constructed in 2001, with a combined nominal capacity of 1.36 gallons of waterborne coating per hour, equipped with two (2) spray guns and dry filters, and exhausting to stack CV-7, S-2.
- (d) CV Line 8, identified as CV-8, consisting of the following equipment:
 - (4) One (1) natural gas fired coating curing oven, identified as CV-8C2, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stack CV-8, S-4.
 - (5) One (1) urethane application spray booth, identified as CV-8SB, constructed in 1997, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, with a nominal capacity of 10 grams of coating per minute per gun, and exhausting to stack CV-8, S-5.
- (e) CV Line 9, identified as CV-9, consisting of the following equipment:
 - (3) One (1) urethane application line, identified as CV-9Ex, constructed in 1996, equipped with six (6) spray guns coating extruded rubber parts and one (1) blown air dryer, with a nominal capacity of 10 grams of coating per minute per gun, and exhausting to stack CV-9, S-5.
 - (4) One (1) natural gas fired coating curing oven with two (2) heat exchangers, identified as CV-9C2, with a nominal capacity of 1.59 MMBtu/hr, and exhausting to stacks CV-9, S-2 and CV-9, S-3.
- (f) CV Line 10, identified as CV-10:
 - (5) One (1) spray booth, identified as CV-10SB1, constructed in 2004, equipped with four (4) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-10, S-5

- (6) One (1) spray booth, identified as CV-10SB2, constructed in 2004, equipped with four (4) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-10, S-6.
- (7) Two (2) infrared coating curing ovens, identified as CV-10C3 and CV-10C4, exhausting to general ventilation.
- (g) CV Line 11, identified as CV-11, consisting of the following equipment:
 - (5) One (1) spray booth, identified as CV-11Ex, constructed in 2000, and modified in 2008 and in 2014, equipped with five (5) high-volume low-pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-11 S-3.
 - (6) One (1) natural gas coating curing oven, identified as CV-11C3, with a heat input capacity of 0.5 MMBtu/hr, and exhausting to stacks CV-11, S-1 and CV-11, S-2.
- (h) One (1) CV Line 12, identified as CV-12, constructed in 2015, consisting of the following equipment:
 - (4) One (1) spray booth, identified as CV-12Ex, equipped with eight (8) high-volume low-pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, with dry filters for particulate control, exhausting to stack CV-12Ex S-1.
- (i) One (1) SDM Line 1 (EA), identified as SDM-1, constructed in 2015, consisting of the following equipment:
 - (6) One (1) spray booth, identified as SDM-1SB, constructed in 2004, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, and exhausting to stack SDM-1, S-5.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-1, C4, with two burners nominally rated at 0.340 MMBtu/hr each, and exhausting to stack SDM-1, S-4.
- (j) SDM Line 2 (EB), identified as SDM-2, constructed in 2013, consisting of the following equipment:
 - (7) One (1) spray booth, identified as SDM-2SB, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, exhausting to stack SDM-2, S-4.
 - (8) One (1) natural gas-fired coating cure oven, identified as SDM-2, C4, with two burners nominally rated at 0.340 MMBtu/hr each, and exhausting to stack SDM-2, S-5.
- (k) SDM Line 3 (EC), identified as SDM-3, consisting of the following equipment:
 - (6) One (1) SDM EC urethane application spray booth, identified as SDM-3SB, constructed in 1996 and modified in 2015 to add one (1) spray gun, equipped with total four (4) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, equipped with dry filters for particulate control and exhausting to stack SDM-3, S-7.

- (7) One (1) natural gas-fired curing oven, identified as SDM-3C2, with a nominal heat input capacity of 1.0 MMBtu/hr, and exhausting to stack SDM-3, S-6.
- (l) SDM Line 4 (ED), identified as SDM-4, consisting of the following equipment:
 - (6) One (1) spray booth, identified as SDM-4SB, constructed in 2002, equipped with six (6) High-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, exhausting to stack SDM-4, S-6.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-4C3, with two burners each having a nominal heat input capacity of 0.34 MMBtu/hr, and exhausting to stack SDM-4, S-5.
- (m) SDM Line 5 (EE), identified as SDM-5, consisting of the following equipment:
 - (6) One (1) spray line, identified as SDM-5SB, constructed in 2002, equipped with six (6) high-volume low-pressure (HVLP) spray guns coating extruded rubber parts, using dry filters as controls, with a nominal capacity of 10 grams per minute of coating per gun, and exhausting to stack SDM-5, S-5.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-5C3, with two (2) burners, each having a nominal heat input capacity of 0.340 MMBtu/hr, exhausting to stacks SDM-5, S-4.
- (n) L-Coat Extrusion Line, identified as LC-1, consisting of the following equipment:
 - (6) One (1) L-Coat Glassline Spray Booth coating extruded rubber parts, identified as LC-1SB1, constructed in 2006, utilizing seven (7) high-volume low-pressure (HVLP) spray guns with a combined nominal capacity of 1.005 gallon of coating per hour and particulate emissions controlled by dry filters, and exhausting to stack LC, S-9.
 - (7) One (1) L-Coat Glassline Spray Booth coating extruded rubber parts, identified as LC-1SB2, constructed in 2007, utilizing seven (7) high-volume low-pressure (HVLP) spray guns with a combined nominal capacity of 1.005 gallon of coating per hour and particulate emissions controlled by dry filters, and exhausting to one (1) stack LC, S-10.
 - (8) One (1) natural gas coating curing oven, identified as LC-1C2, consisting of six (6) natural gas-fired burners with a nominal heat input capacity of 0.086 MMBtu/hr each, and
- (t) One (1) rubber extrusion line, identified as CV-13, constructed in 2015, consisting of:
 - (1) Four (4) rubber extruders, identified as CV-13Ex1 through CV-13Ex4, with a combined nominal capacity of 1,300 pounds of rubber per hour, no duster, without control, exhausting inside.
 - (2) Six (6) natural gas-fired rubber curing ovens, identified as CV-13C1 through CV-13C6, with a combined nominal capacity of 4.51 MMBtu/hour and 1,300 pounds of rubber per hour, without control and exhausting to stacks S-1 through S-6, respectively.
 - (3) One (1) plasma treat operation, with a nominal capacity of 1,300 pounds of rubber per hour, without control and exhausting inside.

- (4) One (1) spray booth, identified as CV-13Ex, equipped with eight (8) high volume low pressure (HVLP) guns coating extruded rubber parts, each with a nominal capacity of 10 grams of coating per minute per gun, equipped with dry filters for particulate control and exhausting to stack CV-13Ex1 S-1.

Insignificant Activities:

- (u) One (1) coating booth, identified as TG7-1, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-1S-1.
- (v) One (1) coating booth, identified as TG7-2, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control and exhausting to stack TG7-2S-2.
- (w) One (1) coating booth, identified as TG7-3, permitted in 2014, equipped with two (2) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-3S-3.
- (x) One (1) coating booth, identified as TG7-4, permitted in 2014, equipped with three (3) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-4S-4.
- (y) One (1) coating booth, identified as TG7-5, permitted in 2014, equipped with three (3) spray guns coating extruded rubber parts, each with a nominal capacity of 10 grams per minute per gun, using dry filters as control, and exhausting to stack TG7-5S-5.

(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 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the following surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications:

- (1) CV Line 5 Spray Booth (CV-5SB)
- (2) CV Line 6 Spray Booth (CV-6SB)
- (3) CV Line 7 waterborne urethane coating Booth (CV-7SB)
- (4) CV Line 10 Spray Booth (CV-10SB1)
- (5) CV Line 10 Spray Booth (CV-10SB2)
- (6) CV Line 11 Spray Booth (CV-11Ex)
- (7) CV Line 12 Spray Booth (CV-12Ex)
- (8) SDM Line 1 Spray Booth (SDM-1SB)
- (9) SDM Line 2 Spray Booth (SDM-2SB)
- (10) SDM Line 3 urethane application Spray Booth (SDM-3SB)
- (11) SDM Line 4 Spray Booth (SDM-4SB)
- (12) SDM Line 5 Spray Line (SDM-5SB)
- (13) L-Coat Glassline Spray Booth (LC-1SB1)
- (14) L-Coat Glassline Spray Booth (LC-1SB2)
- (15) Spray Booth (CV-13Ex)

- (16) Coating Booth (TG7-1)
- (17) Coating Booth (TG7-2)
- (18) Coating Booth (TG7-3)
- (19) Coating Booth (TG7-4)
- (20) Coating Booth (TG7-5)

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities. 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.1.3 Particulate Control

In order to demonstrate compliance with Condition D.1.1, particulate from the dry filters and cartridge filters for particulate control shall be in operation and control emissions at all times when one or more of the below mentioned emission units are in operation:

- (1) CV Line 5 Spray Booth (CV-5SB)
- (2) CV Line 6 Spray Booth (CV-6SB)
- (3) CV Line 7 waterborne urethane coating Booth (CV-7SB)
- (4) CV Line 10 Spray Booth (CV-10SB1)
- (5) CV Line 10 Spray Booth (CV-10SB2)
- (6) CV Line 11 Spray Booth (CV-11Ex)
- (7) CV Line 12 Spray Booth (CV-12Ex)
- (8) SDM Line 1 Spray Booth (SDM-1SB)
- (9) SDM Line 2 Spray Booth (SDM-2SB)
- (10) SDM Line 3 urethane application Spray Booth (SDM-3SB)
- (11) SDM Line 4 Spray Booth (SDM-4SB)
- (12) SDM Line 5 Spray Line (SDM-5SB)
- (13) L-Coat Glassline Spray Booth (LC-1SB1)
- (14) L-Coat Glassline Spray Booth (LC-1SB2)
- (15) Spray Booth (CV-13Ex)
- (16) Coating Booth (TG7-1)
- (17) Coating Booth (TG7-2)
- (18) Coating Booth (TG7-3)
- (19) Coating Booth (TG7-4)
- (20) Coating Booth (TG7-5)

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

D.1.4 Particulate Matter

(a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling the below mentioned surface coating operations. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while the associated booths are in operation. If a condition exists which should result in a response step the Permittee shall take 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 reasonable response steps shall be considered a deviation from this permit.

- (1) CV Line 5 Spray Booth (CV-5SB)
- (2) CV Line 6 Spray Booth (CV-6SB)
- (3) CV Line 7 waterborne urethane coating Booth (CV-7SB)
- (4) CV Line 10 Spray Booth (CV-10SB1)

- (5) CV Line 10 Spray Booth (CV-10SB2)
- (6) CV Line 11 Spray Booth (CV-11Ex)
- (7) CV Line 12 Spray Booth (CV-12Ex)
- (8) SDM Line 1 Spray Booth (SDM-1SB)
- (9) SDM Line 2 Spray Booth (SDM-2SB)
- (10) SDM Line 3 urethane application Spray Booth (SDM-3SB)
- (11) SDM Line 4 Spray Booth (SDM-4SB)
- (12) SDM Line 5 Spray Line (SDM-5SB)
- (13) L-Coat Glassline Spray Booth (LC-1SB1)
- (14) L-Coat Glassline Spray Booth (LC-1SB2)
- (15) Spray Booth (CV-13Ex)
- (16) Coating Booth (TG7-1)
- (17) Coating Booth (TG7-2)
- (18) Coating Booth (TG7-3)
- (19) Coating Booth (TG7-4)
- (20) Coating Booth (TG7-5)

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or evidence of overspray emission is observed, the Permittee shall take 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 reasonable 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.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a record of the weekly filter inspections, weekly overspray observations, and monthly inspections.
- (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:

- (m) One (1) emergency generator nominally rated at 54 HP, burning natural gas, installed in December 2008 and manufactured in 2008.

This emergency generator is a new affected source under 40 CFR 63, Subpart ZZZZ.

(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)]**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (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 unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.
- (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 Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ]
[326 IAC 20-1]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above:

- (1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(c)(6)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Nishikawa Cooper LLC
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T087-36530-00031

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: Nishikawa Cooper LLC
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T087-36530-00031

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nishikawa Cooper LLC
 Source Address: 324 Morrow Street, Topeka, Indiana 46571
 Part 70 Permit No.: T087-36530-00031

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a
Part 70 Administrative Amendment

Source Description and Location

Source Name:	Nishikawa Cooper LLC
Source Location:	324 Morrow Street, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
Operation Permit No.:	T 087-36530-00031
Operation Permit Issuance Date:	July 13, 2016
Administrative Amendment No.:	087-37999-00031
Permit Reviewer:	Nicholas Eilerman

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 087-36530-00031 on July 13, 2016. There have been no subsequent approvals issued.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (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. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
LaGrange 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 for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
LaGrange 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.

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:

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
CV Line 5 (CV-5SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 6 (CV-6SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 7 (CV-7SB) Spray Booth	5.04	5.04	5.04	0	0	5.27	0	0.28	0.28 Ethanol
CV Line 8 (CV-8SB) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 9 (CV-9Ex) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 10 (CV-10SB1) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line 10 (CV-10SB2) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line (CV-11Ex) Spray Booth	3.62	3.62	3.62	0	0	0.35	0	0	0
CV Line (CV-12Ex) Spray Booth	5.79	5.79	5.79	0	0	0.56	0	0	0
spray booth (CV-13Ex)	5.79	5.79	5.79	0	0	0.56	0	0	0
SDM Line 1 (SDM-1SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0	0
SDM Line 2 EB (SDM-2SB) Coating Booth (MSM 33346)	2.29	2.29	2.29	0	0	7.32	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
SDM Line 3 (SDM-3SB) Spray Booth	1.53	1.53	1.53	0	0	4.88	0	0.00	0.00
SDM Line 4 (SDM-4SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00
SDM Line 5 (SDM-5SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00
L-Coat Extursion Line (LC-1SB1 and LC-1SB2) Spray Booth	15.83	15.83	15.83	0	0	17.86	0	4.06	4.06 Ethanol
Off Line Finishing Spray Booth (F-1)	0.35	0.35	0.35	0	0	0.32	0	0	0
Off Line Finishing Spray Booth (F-2)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Line Finishing Spray Booth (F-3)	0.25	0.25	0.25	0	0	0.10	0	0	0
Off Line Finishing Spray Booth (F-4)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Hand Wiping Operation (F-5) (AA 31713)	0	0	0	0	0	0.001	0	0	0
Hand Wiping Operation (AA 33069)	0	0	0	0	0	0.19	0	0	0
hand wiping operation	0	0	0	0	0	3.33	0	0	0
Rubber Extrusion Line (DHS) Ink Jet Printer (AA 32511)	0.01	0.01	0.01	0	0	0.003	0	0	0
Cleaning Agent	11.66	11.66	11.66	0	0	1.42	0	0	0
Coating Booth TG7-1	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-2	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-3	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-4	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02
Coating Booth TG7-5	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02
Off Line Primer Downdraft Table (F-3-1)	0	0	0	0	0	0.06	0	0	0
Dusters/Extruding (CV-5Ex)	2.19	2.19	2.19	0	0	0.88	0	0.03	0.521 Acetophenone
Extruding (CV-6Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Dusters/Extruding (CV-7Ex)	2.19	2.19	2.19	0	0	1.31	0	0.05	
Extruding (CV-8Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (CV-9Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (CV-10Ex)	4.96E-5	4.96E-5	4.96E-5	0	0	1.64	0	0.06	
Dusters/Extruding (CV-11Ex)	2.19	2.19	2.19	0	0	0.44	0	0.02	
Extruding (CV-12Ex)	8.60E-5	8.60E-5	8.60E-5	0	0	0.20	0	0.11	
rubber extruders (CV-13Ex1 through CV-13Ex4)	8.5979E-5	8.5979E-5	8.5979E-5	-	-	0.20	-	0.11	
Extruding (SDM-1Ex)	8.88E-5	8.88E-5	8.88E-5	0	0	2.94	0	0.11	
Extruding (SDM-2Ex) (MSM 33346)	8.53E-5	8.53E-5	8.53E-5	0	0	2.82	0	0.11	
Extruding (SDM-3Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (SDM-4Ex)	8.53E-5	8.53E-5	8.53E-5	0	0	2.82	0	0.11	
Extruding (SDM-5Ex)	8.53E-5	8.53E-5	8.53E-5	0	0	2.82	0	0.11	
Plastic Extruding (LC-1Ex)	2.51E-6	2.51E-6	2.51E-6	0	0	0.08	0	0.003	
Rubber Extruding (LC-1Ex)	1.44E-4	1.44E-4	1.44E-4	0	0	4.78	0	0.181	
Plastic Extruding	3.98E-5	3.98E-5	3.98E-5	0	0	1.32	0	0.05	

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								Worst Single HAP
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	
Rubber Extruding (DHS) (New) (AA 32511)	2.33E-5	2.33E-5	2.33E-5	0	0	0.77	0	0.03	33.90 Carbon Disulfide
Hot Air Curing (CV-5C)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (CV-6C1 and CV-6C2)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (CV-7C)	0	0	0	0	0	4.99	0	2.56	
Hot Air Curing (CV-10C1 and CV-10C2)	0	0	0	0	0	6.24	0	3.21	
Hot Air Curing (CV-11C1 and CV-11C2)	0	0	0	0	0	1.66	0	0.85	
Hot Air Curing (CV-12)	0	0	0	0	0	10.82	0	5.56	
Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3)	0	0	0	0	0	11.17	0	5.74	
Hot Air Curing (SDM-2C1) (MSM 33346)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (SDM-3C1)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (SDM-4C1 and SDM-4C2)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (SDM-5C1 and SDM-5C2)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (LC-1C1)	0	0	0	0	0	18.17	0	9.33	
Hot Air Curing (DHS) (New) (AA 32511)	0	0	0	0	0	2.93	0	1.50	
Natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	0	0	0	0	0	10.82	0.00	5.56	
Mixing and Milling (Mix-1)	0.59	0.59	0.59	0	0	0.196	0	0.148	0.07 Carbon Disulfide
CV-12 Plasma Treat	0	0	0	0	1.23	0	0	0	0
Plasma treat operation	0	0	0	0	1.23	0	0	0	
Natural Gas Combustion	0.40	1.62	1.62	0.13	21.31	1.17	17.90	0.37	0.35 Hexane
Natural Gas-Fired Emergency Generator	negl.	negl.	negl.	negl.	0.38	0.01	0.03	negl.	negl.
Insignificant Activities	negl.	negl.	negl.	0	0	2.00	0	negl.	negl.
Total PTE of Entire Source	95.24	96.46	96.46	0.13	24.15	212.16	17.93	62.94	36.98 Carbon Disulfide
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
¹Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
² PM_{2.5} listed is direct PM_{2.5}.

- (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 HAPs, 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. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on the Title V Renewal No. 087-36530-00031, issued on July 13, 2016.

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nishikawa Cooper LLC on December 16, 2016, relating to the modification of SDM Line 4 to add in one (1) rubber extruder and the construction and operation of an insignificant activity consisting of one (1) research and development laboratory. The addition of one extruder to SDM Line 4 takes the total number of extruders for this line from 4 to 5 extruders. No other part of SDM Line 4 is being modified as part of this administrative amendment.

The following is a list of the modified emission units and pollution control devices:

- (a) SDM Line 4 (ED), identified as SDM-4, consisting of the following equipment:
- (1) One (1) core metal heater, identified as SDM-4MH, with two (2) natural gas-fired burners, each has a nominal heat input capacity of 0.375 million British thermal unit per hour, and exhausting to stack SDM-4, S-1.
 - (2) Five (5) extruders, collectively identified as SDM-4Ex, four (4) constructed in 2002 and one (1) constructed in 2016, with a combined nominal capacity of 1611.25 pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.
 - (3) Two (2) natural gas-fired microwave rubber curing ovens, identified as SDM-4C1, each with a nominal heat input capacity of 0.143 MMBtu/hr, and both exhausting to stack SDM-4, S-2.
 - (4) One (1) natural gas-fired curing oven, identified as SDM-4C2, with two (2) burners, each with a nominal heat input capacity of 0.850 MMBtu/hr, and exhausting to stack SDM-4, S-3.
 - (5) One (1) electric plasma arc unit, identified as SDM-4PI, exhausting to stack SDM-4, S-4.
 - (6) One (1) spray booth, identified as SDM-4SB, constructed in 2002, equipped with six (6) High-volume low-pressure (HVLP) spray guns coating extruded rubber parts, with a nominal capacity of 10 grams of coating per minute per gun, using dry filters to control PM overspray emissions, exhausting to stack SDM-4, S-6.
 - (7) One (1) natural gas-fired coating cure oven, identified as SDM-4C3, with two burners each having a nominal heat input capacity of 0.34 MMBtu/hr, and exhausting to stack SDM-4, S-5.

The following is a list of the proposed insignificant activity:

- (a) One research and development laboratory as defined in 326 IAC2-7-1(21)(D) and (E)

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 Administrative Amendment at 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 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Combined HAPs
One (1) new extruder to SDM-4	2.13E-5	2.13E-5	2.13E-5	-	-	0.05	-	0.012 Acetophenone	0.027
Research and development laboratory	-	-	-	-	-	-	-	-	-
Total:	2.13E-5	2.13E-5	2.13E-5	-	-	0.05	-	0.012 Acetophenone	0.027

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

Pursuant to 326 IAC 2-7-11(a)(8)(A), this change to the permit is considered an administrative amendment because the permit is amended to incorporate an exempt units as described in 326 IAC 2-1.1-3 that does not otherwise constitute a modification for purposes of 326 IAC 2-7-10.5 (Source Modifications) or 326 IAC 2-7-12 (Permit Modifications).

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 administrative amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (ton/year)						
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO
One (1) new extruder to SDM-4	2.13E-5	2.13E-5	2.13E-5	-	-	0.05	-
Research and development laboratory	-	-	-	-	-	-	-
Total for Modification	2.13E-5	2.13E-5	2.13E-5	-	-	0.05	-
PSD Major Source Thresholds	250	250	250	250	250	250	250

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

- (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.

Potential to Emit After Issuance

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 administrative amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
CV Line 5 (CV-5SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 6 (CV-6SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 7 (CV-7SB) Spray Booth	5.04	5.04	5.04	0	0	5.27	0	0.28	0.28 Ethanol
CV Line 8 (CV-8SB) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 9 (CV-9Ex) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 10 (CV-10SB1) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line 10 (CV-10SB2) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line (CV-11Ex) Spray Booth	3.62	3.62	3.62	0	0	0.35	0	0	0
CV Line (CV-12Ex) Spray Booth	5.79	5.79	5.79	0	0	0.56	0	0	0
spray booth (CV-13Ex)	5.79	5.79	5.79	0	0	0.56	0	0	0
SDM Line 1 (SDM-1SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0	0
SDM Line 2 EB (SDM-2SB) Coating Booth (MSM 33346)	2.29	2.29	2.29	0	0	7.32	0	0	0
SDM Line 3 (SDM-3SB) Spray Booth	1.53	1.53	1.53	0	0	4.88	0	0.00	0.00
SDM Line 4 (SDM-4SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00
SDM Line 5 (SDM-5SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00
L-Coat Extrusion Line (LC-1SB1 and LC-1SB2) Spray Booth	15.83	15.83	15.83	0	0	17.86	0	4.06	4.06 Ethanol
Off Line Finishing Spray Booth (F-1)	0.35	0.35	0.35	0	0	0.32	0	0	0
Off Line Finishing Spray Booth (F-2)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Line Finishing Spray Booth (F-3)	0.25	0.25	0.25	0	0	0.10	0	0	0
Off Line Finishing Spray Booth (F-4)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Hand Wiping Operation (F-5) (AA 31713)	0	0	0	0	0	0.001	0	0	0
Hand Wiping Operation (AA 33069)	0	0	0	0	0	0.19	0	0	0
hand wiping operation	0	0	0	0	0	3.33	0	0	0
Rubber Extrusion Line (DHS) Ink Jet Printer (AA 32511)	0.01	0.01	0.01	0	0	0.003	0	0	0
Cleaning Agent	11.66	11.66	11.66	0	0	1.42	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Coating Booth TG7-1	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-2	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-3	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01
Coating Booth TG7-4	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02
Coating Booth TG7-5	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02
Off Line Primer Downdraft Table (F-3-1)	0	0	0	0	0	0.06	0	0	0
Dusters/Extruding (CV-5Ex)	2.19	2.19	2.19	0	0	0.88	0	0.03	0.522 Acetophenone
Extruding (CV-6Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Dusters/Extruding (CV-7Ex)	2.19	2.19	2.19	0	0	1.31	0	0.05	
Extruding (CV-8Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (CV-9Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (CV-10Ex)	4.96E-5	4.96E-5	4.96E-5	0	0	1.64	0	0.06	
Dusters/Extruding (CV-11Ex)	2.19	2.19	2.19	0	0	0.44	0	0.02	
Extruding (CV-12Ex)	8.60E-5	8.60E-5	8.60E-5	0	0	0.20	0	0.11	
rubber extruders (CV-13Ex1 through CV-13Ex4)	8.5979E-5	8.5979E-5	8.5979E-5	-	-	0.20	-	0.11	
Extruding (SDM-1Ex)	8.88E-5	8.88E-5	8.88E-5	0	0	2.94	0	0.11	
Extruding (SDM-2Ex) (MSM 33346)	8.53E-5	8.53E-5	8.53E-5	0	0	2.82	0	0.11	
Extruding (SDM-3Ex)	2.65E-5	2.65E-5	2.65E-5	0	0	0.88	0	0.03	
Extruding (SDM-4Ex)	1.07E-4	1.07E-4	1.07E-4	0	0	2.87	0	0.11	
Extruding (SDM-5Ex)	8.53E-5	8.53E-5	8.53E-5	0	0	2.82	0	0.11	
Plastic Extruding (LC-1Ex)	2.51E-6	2.51E-6	2.51E-6	0	0	0.08	0	0.003	
Rubber Extruding (LC-1Ex)	1.44E-4	1.44E-4	1.44E-4	0	0	4.78	0	0.181	
Plastic Extruding	3.98E-5	3.98E-5	3.98E-5	0	0	1.32	0	0.05	
Rubber Extruding (DHS) (New) (AA 32511)	2.33E-5	2.33E-5	2.33E-5	0	0	0.77	0	0.03	
Hot Air Curing (CV-5C)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (CV-6C1 and CV-6C2)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (CV-7C)	0	0	0	0	0	4.99	0	2.56	
Hot Air Curing (CV-10C1 and CV-10C2)	0	0	0	0	0	6.24	0	3.21	
Hot Air Curing (CV-11C1 and CV-11C2)	0	0	0	0	0	1.66	0	0.85	
Hot Air Curing (CV-12)	0	0	0	0	0	10.82	0	5.56	
Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3)	0	0	0	0	0	11.17	0	5.74	
Hot Air Curing (SDM-2C1) (MSM 33346)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (SDM-3C1)	0	0	0	0	0	3.33	0	1.71	
Hot Air Curing (SDM-4C1 and SDM-4C2)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (SDM-5C1 and SDM-5C2)	0	0	0	0	0	10.73	0	5.51	
Hot Air Curing (LC-1C1)	0	0	0	0	0	18.17	0	9.33	
Hot Air Curing (DHS) (New) (AA 32511)	0	0	0	0	0	2.93	0	1.50	
Natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	0	0	0	0	0	10.82	0.00	5.56	
Mixing and Milling (Mix-1)	0.59	0.59	0.59	0	0	0.196	0	0.148	0.07 Carbon Disulfide
CV-12 Plasma Treat	0	0	0	0	1.23	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source before modification (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Plasma treat operation	0	0	0	0	1.23	0	0	0	
Natural Gas Combustion	0.40	1.62	1.62	0.13	21.31	1.17	17.90	0.37	0.35 Hexane
Natural Gas-Fired Emergency Generator	negl.	negl.	negl.	negl.	0.38	0.01	0.03	negl.	negl.
Insignificant Activities	negl.	negl.	negl.	0	0	2.00	0	negl.	negl.
Research and development laboratory	0	0	0	0	0	0	0	0	0
Total PTE of Entire Source	95.24	96.46	96.46	0.13	24.15	212.20	17.93	62.96	36.98 Carbon Disulfide
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible

¹Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

²PM_{2.5} listed is direct PM_{2.5}.

- (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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing 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.
- (d) 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.

- (e) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (f) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification because the units do not have PTE greater than major source thresholds for regulated pollutants involved. .

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of the new extruder 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 2-7-6(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.

Extruder

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

Pursuant to 326 IAC 6-3-1(b)(14), the extruder is not subject to the requirements of 326 IAC 6-3, since the PTE from it is less than five hundred fifty-one thousandths (0.551) pounds per hour.

There are no 326 IAC 8 rules applicable to this amendment.

Research and Development Laboratory

There are no 326 IAC rules applicable to this addition since it does not produce any emissions.

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.

There are no new or modified compliance requirements included with this modification since the new emission units have no applicable rules to comply with.

Proposed Changes

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

(1) A.2 has been updated to include the new extruder.

(2) A.3 has been updated to include the new research and development laboratory.

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

...

(l) SDM Line 4 (ED), identified as SDM-4, consisting of the following equipment:

...

(2) ~~Four (4)~~ **Five (5)** extruders, collectively identified as SDM-4Ex, **four (4)** constructed in 2002 **and one (1) constructed in 2016**, with a combined nominal capacity of ~~4289~~ **1611.25** pounds of rubber per hour, no duster, no control, and exhausting to general ventilation.

...

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

...

(aa) One (1) research and development laboratory as defined in 326 IAC 2-7-1(21)(D) and (E).

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 December 16, 2016.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Nicholas Eilerman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027, extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations
Unlimited Summary of Emissions before Amendment

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

Uncontrolled Potential to Emit before Amendment (tons/year)									
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP
CV Line 5 (CV-5SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 6 (CV-6SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19 Ethanol
CV Line 7 (CV-7SB) Spray Booth	5.04	5.04	5.04	0	0	5.27	0	0.28	0.28 Ethanol
CV Line 8 (CV-8SB) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 9 (CV-9Ex) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19 Ethanol
CV Line 10 (CV-10SB1) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line 10 (CV-10SB2) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0
CV Line (CV-11Ex) Spray Booth	3.62	3.62	3.62	0	0	0.35	0	0	0
CV Line (CV-12Ex) Spray Booth	5.79	5.79	5.79	0	0	0.56	0	0	0
spray booth (CV-13Ex)	5.79	5.79	5.79	0	0	0.56	0	0	0
SDM Line 1 (SDM-1SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0	0
SDM Line 2 EB (SDM-2SB) Coating Booth (MSM 33346)	2.29	2.29	2.29	0	0	7.32	0	0	0
SDM Line 3 (SDM-3SB) Spray Booth	1.53	1.53	1.53	0	0	4.88	0	0.00	0.00 Glycol Ethers
SDM Line 4 (SDM-4SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00 Ethylene Glycol
SDM Line 5 (SDM-5SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00 Ethylene Glycol
L-Coat Extrusion Line (LC-1SB1 and LC-1SB2) Spray Booth	15.83	15.83	15.83	0	0	17.86	0	4.06	4.06 Ethylene Glycol
Off Line Finishing Spray Booth (F-1)	0.35	0.35	0.35	0	0	0.32	0	0	0
Off Line Finishing Spray Booth (F-2)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Line Finishing Spray Booth (F-3)	0.25	0.25	0.25	0	0	0.10	0	0	0
Off Line Finishing Spray Booth (F-4)	0.35	0.35	0.35	0	0	0.03	0	0	0
Off Line Finishing Spray Booth (F-5) (AA 31713)	0	0	0	0	0	0.001	0	0	0
Hand Wiping Operation (AA 33069)	0	0	0	0	0	0.19	0	0	0
hand wiping operation	0	0	0	0	0	3.33	0	0	0
Rubber Extrusion Line (DHS) Ink Jet Printer (AA 32511)	0.01	0.01	0.01	0	0	0.003	0	0	0
Cleaning Agent	11.66	11.66	11.66	0	0	1.42	0	0	0
Coating Booth TG7-1	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01 Glycol Ethers/ Xylene
Coating Booth TG7-2	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01 Glycol Ethers/ Xylene
Coating Booth TG7-3	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01 Glycol Ethers/ Xylene
Coating Booth TG7-4	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02 Glycol Ethers/ Xylene
Coating Booth TG7-5	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02 Glycol Ethers/ Xylene
Off Line Primer Downdraft Table (F-3-1)	0	0	0	0	0	0.06	0	0	0

Appendix A: Emissions Calculations
Unlimited Summary of Emissions Continued

Uncontrolled Potential to Emit (tons/year)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Dusters/Extruding (CV-5Ex)	2.19	2.19	2.19	0	0	0.88	0	0.03	0.521 Acetophenone	
Extruding (CV-6Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Dusters/Extruding (CV-7Ex)	2.19	2.19	2.19	0	0	1.31	0	0.05		
Extruding (CV-8Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (CV-9Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (CV-10Ex)	4.96E-05	4.96E-05	4.96E-05	0	0	1.64	0	0.06		
Dusters/Extruding (CV-11Ex)	2.19	2.19	2.19	0	0	0.44	0	0.02		
Extruding (CV-12Ex)	8.60E-05	8.60E-05	8.60E-05	0	0	0.20	0	0.11		
13Ex1 through CV-13Ex4)	8.5979E-05	8.5979E-05	8.5979E-05	0	0	0.20	0	0.11		
Extruding (SDM-1Ex)	8.88E-05	8.88E-05	8.88E-05	0	0	2.94	0	0.11		
Extruding (SDM-2Ex) (MSM 33346)	8.53E-05	8.53E-05	8.53E-05	0	0	2.82	0	0.11		
Extruding (SDM-3Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (SDM-4Ex)	8.53E-05	8.53E-05	8.53E-05	0	0	2.82	0	0.11		
Extruding (SDM-5Ex)	8.53E-05	8.53E-05	8.53E-05	0	0	2.82	0	0.11		
Plastic Extruding (LC-1Ex)	2.51E-06	2.51E-06	2.51E-06	0	0	0.08	0	0.003		
Rubber Extruding (LC-1Ex)	1.44E-04	1.44E-04	1.44E-04	0	0	4.78	0	0.181		
Plastic Extruding	3.98E-05	3.98E-05	3.98E-05	0	0	1.32	0	0.05		
Rubber Extruding (DHS) (New) (AA 32511)	2.33E-05	2.33E-05	2.33E-05	0	0	0.77	0	0.03		
Hot Air Curing (CV-5C)	0	0	0	0	0	3.33	0	1.71		36.90 Carbon Disulfide
Hot Air Curing (CV-6C1 and CV-6C2)	0	0	0	0	0	3.33	0	1.71		
Hot Air Curing (CV-7C)	0	0	0	0	0	4.99	0	2.56		
Hot Air Curing (CV-10C1 and CV-10C2)	0	0	0	0	0	6.24	0	3.21		
Hot Air Curing (CV-11C1 and CV-11C2)	0	0	0	0	0	1.66	0	0.85		
Hot Air Curing (CV-12)	0	0	0	0	0	10.82	0	5.56		
Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3)	0	0	0	0	0	11.17	0	5.74		
Hot Air Curing (SDM-2C1) (MSM 33346)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (SDM-3C1)	0	0	0	0	0	3.33	0	1.71		
Hot Air Curing (SDM-4C1 and SDM-4C2)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (SDM-5C1 and SDM-5C2)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (LC-1C1)	0	0	0	0	0	18.17	0	9.33		
Hot Air Curing (DHS) (New) (AA 32511)	0	0	0	0	0	2.93	0	1.50		
Natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	0	0	0	0	0	10.82	0.00	5.56		
Mixing and Milling (Mix-1)	0.59	0.59	0.59	0	0	0.20	0	0.15	0.07 Carbon Disulfide	
CV-12/CV-13 Plasma Treat	0	0	0	0	2.46	0	0	0	0	
Natural Gas Combustion	0.40	1.62	1.62	0.13	21.31	1.17	17.90	0.37	0.35 Hexane	
Natural Gas-Fired Emergency Generator	negl.	negl.	negl.	negl.	0.38	0.01	0.03	negl.	negl.	
Insignificant Activities	negl.	negl.	negl.	0	0	2.00	0	negl.	negl.	
Total	95.24	96.46	96.46	0.13	24.15	212.16	17.93	62.94	36.98 Carbon Disulfide	

* Extruding (SDM-1Ex) modified in 2015 to include one new extruder with a maximum capacity of 53 pounds per hour. Due to the addition of the new extruder the existing Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3) maximum capacity increased by 53 pounds per hour also, without adding any new curing units.

Appendix A: Emissions Calculations
Unlimited Summary of Emissions after Amendment

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

Uncontrolled Potential to Emit after Amendment (tons/year)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
CV Line 5 (CV-5SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19	Ethanol
CV Line 6 (CV-6SB) Spray Booth	3.46	3.46	3.46	0	0	3.61	0	0.19	0.19	Ethanol
CV Line 7 (CV-7SB) Spray Booth	5.04	5.04	5.04	0	0	5.27	0	0.28	0.28	Ethanol
CV Line 8 (CV-8SB) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19	Ethanol
CV Line 9 (CV-9Ex) Spray Booth	4.34	4.34	4.34	0	0	0.42	0	0.19	0.19	Ethanol
CV Line 10 (CV-10SB1) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0	
CV Line 10 (CV-10SB2) Spray Booth	4.06	4.06	4.06	0	0	0.28	0	0	0	
CV Line (CV-11Ex) Spray Booth	3.62	3.62	3.62	0	0	0.35	0	0	0	
CV Line (CV-12Ex) Spray Booth	5.79	5.79	5.79	0	0	0.56	0	0	0	
spray booth (CV-13Ex)	5.79	5.79	5.79	0	0	0.56	0	0	0	
SDM Line 1 (SDM-1SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0	0	
SDM Line 2 EB (SDM-2SB) Coating Booth (MSM 33346)	2.29	2.29	2.29	0	0	7.32	0	0	0	
SDM Line 3 (SDM-3SB) Spray Booth	1.53	1.53	1.53	0	0	4.88	0	0.00	0.00	Glycol Ethers
SDM Line 4 (SDM-4SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00	Ethylene Glycol
SDM Line 5 (SDM-5SB) Spray Booth	2.29	2.29	2.29	0	0	7.32	0	0.00	0.00	Ethylene Glycol
L-Coat Extrusion Line (LC 1SB1 and LC-1SB2) Spray Booth	15.83	15.83	15.83	0	0	17.86	0	4.06	4.06	Ethylene Glycol
Off Line Finishing Spray Booth (F-1)	0.35	0.35	0.35	0	0	0.32	0	0	0	
Off Line Finishing Spray Booth (F-2)	0.35	0.35	0.35	0	0	0.03	0	0	0	
Off Line Finishing Spray Booth (F-3)	0.25	0.25	0.25	0	0	0.10	0	0	0	
Off Line Finishing Spray Booth (F-4)	0.35	0.35	0.35	0	0	0.03	0	0	0	
Off Line Finishing Spray Booth (F-5) (AA 31713)	0	0	0	0	0	0.001	0	0	0	
Hand Wiping Operation (AA 33069)	0	0	0	0	0	0.19	0	0	0	
hand wiping operation	0	0	0	0	0	3.33	0	0	0	
Rubber Extrusion Line (DHS) Ink Jet Printer (AA 32511)	0.01	0.01	0.01	0	0	0.003	0	0	0	
Cleaning Agent	11.66	11.66	11.66	0	0	1.42	0	0	0	
Coating Booth TG7-1	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01	Glycol Ethers/ Xylene
Coating Booth TG7-2	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01	Glycol Ethers/ Xylene
Coating Booth TG7-3	0.70	0.70	0.70	0	0	0.07	0	0.02	0.01	Glycol Ethers/ Xylene
Coating Booth TG7-4	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02	Glycol Ethers/ Xylene
Coating Booth TG7-5	1.05	1.05	1.05	0	0	0.10	0	0.03	0.02	Glycol Ethers/ Xylene
Off Line Primer Downdraft Table (F-3-1)	0	0	0	0	0	0.06	0	0	0	

Appendix A: Emissions Calculations
Unlimited Summary of Emissions Continued

Uncontrolled Potential to Emit (tons/year)										
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Dusters/Extruding (CV-5Ex)	2.19	2.19	2.19	0	0	0.88	0	0.03	0.532 Acetophenone	
Extruding (CV-6Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Dusters/Extruding (CV-7Ex)	2.19	2.19	2.19	0	0	1.31	0	0.05		
Extruding (CV-8Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (CV-9Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (CV-10Ex)	4.96E-05	4.96E-05	4.96E-05	0	0	1.64	0	0.06		
Dusters/Extruding (CV-11Ex)	2.19	2.19	2.19	0	0	0.44	0	0.02		
Extruding (CV-12Ex)	8.60E-05	8.60E-05	8.60E-05	0	0	0.20	0	0.11		
13Ex1 through CV-13Ex4)	8.5979E-05	8.5979E-05	8.5979E-05	0	0	0.20	0	0.11		
Extruding (SDM-1Ex)	8.88E-05	8.88E-05	8.88E-05	0	0	2.94	0	0.11		
Extruding (SDM-2Ex) (MSM 33346)	8.53E-05	8.53E-05	8.53E-05	0	0	2.82	0	0.11		
Extruding (SDM-3Ex)	2.65E-05	2.65E-05	2.65E-05	0	0	0.88	0	0.03		
Extruding (SDM-4Ex)	1.07E-04	1.07E-04	1.07E-04	0	0	2.87	0	0.13		
Extruding (SDM-5Ex)	8.53E-05	8.53E-05	8.53E-05	0	0	2.82	0	0.11		
Plastic Extruding (LC-1Ex)	2.51E-06	2.51E-06	2.51E-06	0	0	0.08	0	0.003		
Rubber Extruding (LC-1Ex)	1.44E-04	1.44E-04	1.44E-04	0	0	4.78	0	0.181		
Plastic Extruding	3.98E-05	3.98E-05	3.98E-05	0	0	1.32	0	0.05		
Rubber Extruding (DHS) (New) (AA 32511)	2.33E-05	2.33E-05	2.33E-05	0	0	0.77	0	0.03		
Hot Air Curing (CV-5C)	0	0	0	0	0	3.33	0	1.71		36.90 Carbon Disulfide
Hot Air Curing (CV-6C1 and CV-6C2)	0	0	0	0	0	3.33	0	1.71		
Hot Air Curing (CV-7C)	0	0	0	0	0	4.99	0	2.56		
Hot Air Curing (CV-10C1 and CV-10C2)	0	0	0	0	0	6.24	0	3.21		
Hot Air Curing (CV-11C1 and CV-11C2)	0	0	0	0	0	1.66	0	0.85		
Hot Air Curing (CV-12)	0	0	0	0	0	10.82	0	5.56		
Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3)	0	0	0	0	0	11.17	0	5.74		
Hot Air Curing (SDM-2C1) (MSM 33346)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (SDM-3C1)	0	0	0	0	0	3.33	0	1.71		
Hot Air Curing (SDM-4C1 and SDM-4C2)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (SDM-5C1 and SDM-5C2)	0	0	0	0	0	10.73	0	5.51		
Hot Air Curing (LC-1C1)	0	0	0	0	0	18.17	0	9.33		
Hot Air Curing (DHS) (New) (AA 32511)	0	0	0	0	0	2.93	0	1.50		
Natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	0	0	0	0	0	10.82	0.00	5.56		
Mixing and Milling (Mix-1)	0.59	0.59	0.59	0	0	0.20	0	0.15	0.07 Carbon Disulfide	
CV-12/CV-13 Plasma Treat	0	0	0	0	2.46	0	0	0	0	
Natural Gas Combustion	0.40	1.62	1.62	0.13	21.31	1.17	17.90	0.37	0.35 Hexane	
Natural Gas-Fired Emergency Generator	negl.	negl.	negl.	negl.	0.38	0.01	0.03	negl.	negl.	
Insignificant Activities	negl.	negl.	negl.	0	0	2.00	0	negl.	negl.	
Research and development laboratory	0	0	0	0	0	0	0	0	0 0	
Total	95.24	96.46	96.46	0.13	24.15	212.20	17.93	62.96	36.98 Carbon Disulfide	

* Extruding (SDM-1Ex) modified in 2015 to include one new extruder with a maximum capacity of 53 pounds per hour. Due to the addition of the new extruder the existing Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3) maximum capacity increased by 53 pounds per hour also, without adding any new curing units.

Appendix A: Emissions Calculations
Unlimited Summary of Emissions of addition

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

Process/ Emission Unit	Uncontrolled and Unlimited Potential To Emit of the Entire Source (ton/yr)								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
SDM Line 4 (ED) - Fifth Rubber Extruder	2.13E-05	2.13E-05	2.13E-05	0.00	0.00	0.050	0.00	0.027	0.012
Research and development laboratory	0	0	0	0	0	0	0	0	0
Total PTE of Entire Source	2.13E-05	2.13E-05	2.13E-05	0.00	0.00	0.050	0.00	0.027	0.012
<i>Administrative Amendment Thresholds</i>	5	5	5	10	10	10	10	2.5	1

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency	Controlled Particulate (ton/yr)
CV Line 5 Spray Booth (CV-5SB)	FKWA	8.51	60.20%	49.8%	10.4%	52.2%	34.70%	0.93	1.85	0.89	0.82	19.79	3.61	3.46	2.55	75%	0.17
CV Line 6 Spray Booth (CV-6SB)	FKWA	8.51	60.20%	49.8%	10.4%	52.2%	34.70%	0.93	1.85	0.89	0.82	19.79	3.61	3.46	2.55	75%	0.17
Line 7 Waterborne Urethane Coating Booth (CV-7SB)	FKWA	8.51	60.20%	49.8%	10.4%	52.2%	34.70%	1.36	1.85	0.89	1.20	28.89	5.27	5.04	2.55	75%	0.25
L-Coat Glassline Spray Booths (LC-1SB1 & LC-1SB2)	F-UWG-HS/EMRALON 8370APA-HS (worst case coating)	9.20	22.00%	0.0%	22.0%	0.0%	78.00%	2.01	2.02	2.02	4.08	97.86	17.86	15.83	2.59	75%	0.79
Off Line Finishing Booth (F-5)* (AA 31713)	FKWD	8.35	70.83%	69.8%	1.03%	0.0%	0.00%	0.003	0.09	0.09	0.000	0.006	0.001	0.00	N/A	100%	0.00
Rubber Extrusion Line (DHS) Ink Jet Printer (AA 32511)	Videojet Ink	8.51	80.00%	79.0%	1.0%	79.0%	20.00%	0.008	0.41	0.09	0.001	0.016	0.003	0.01	N/A	75%	0.01
Hand Wiping Operation	Anti-Splitting Mixture**	6.50	100.00%	0.5%	99.54%	0.0%	0.00%	0.007	6.47	6.47	0.043	1.040	0.19	0.00	N/A	100%	0.00

Potential to Emit **6.97** **167.39** **30.55** **27.80** **1.40**

METHODOLOGY

*Hand wipe and brush application
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/hr) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
** Anti-Splitting Mixture is a 50/50 mix of methylcyclohexane and isopropyl alcohol.

**Appendix A: Emissions Calculations
VOC and Particulate Continued**

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (g/min/gun)	Number of Guns	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Controlled Particulate (ton/yr)
Urethane Application Spray Booth (CV-8SB)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	6.00	0.21	0.10	0.10	2.28	0.42	4.34	0.29	75%	0.22
Urethane Application Line (CV-9Ex)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	6.00	0.21	0.10	0.10	2.28	0.42	4.34	0.29	75%	0.22
CV Line 10 Spray Booth (CV-10SB1)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	4.00	0.21	0.10	0.06	1.52	0.28	4.06	N/A	65%	0.20
CV Line 10 Spray Booth (CV-10SB2)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	4.00	0.21	0.10	0.06	1.52	0.28	4.06	N/A	65%	0.20
CV Line 11 Spray Booth (CV-11Ex)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	5.00	0.21	0.10	0.08	1.90	0.35	3.62	0.29	75%	0.18
CV Line 12 Spray Booth (CV-12Ex)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	8.00	0.21	0.10	0.13	3.04	0.56	5.79	0.29	75%	0.29
CV Line 13 Spray Booth (CV-13Ex)	FKWA	8.35	49.96%	48.76%	1.20%	52.2%	34.70%	10.00	8.00	0.21	0.10	0.13	3.04	0.56	5.79	0.29	75%	0.29
SDM Line 1 (EA) Spray Booth (SDM-1SB)	FUWT	8.46	73.60%	52.5%	21.08%	52.2%	26.37%	10.00	6.00	3.73	1.78	1.67	40.12	7.32	2.29	6.76	75%	0.11
SDM Line 2 (EB) Spray Booth (SDM-2SB) (MSM 33346)	FUWT	8.46	73.60%	52.5%	21.08%	52.2%	26.37%	10.00	6.00	3.73	1.78	1.67	40.12	7.32	2.29	6.76	75%	0.11
SDM Line 3 (EC) Urethane Application Spray Booth (SDM-3SB)	FUWT	8.46	73.60%	52.5%	21.08%	52.2%	26.37%	10.00	4.00	3.73	1.78	1.11	26.74	4.88	1.53	6.76	75%	0.08
SDM Line 4 (ED) Spray Booth (SDM-4SB)	FUWT	8.46	73.60%	52.5%	21.08%	52.2%	26.37%	10.00	6.00	3.73	1.78	1.67	40.12	7.32	2.29	6.76	75%	0.11
SDM Line 5 (EE) Spray Booth (SDM-5SB)	FUWT	8.46	73.60%	52.5%	21.08%	52.2%	26.37%	10.00	6.00	3.73	1.78	1.67	40.12	7.32	2.29	6.76	75%	0.11
Off Line Finishing Booth (F-1)	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	1.00	0.05	0.05	0.01	0.19	0.03	0.35	N/A	75%	0.02
Off Line Finishing Booth (F-2)	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	1.00	0.05	0.05	0.01	0.19	0.03	0.35	N/A	75%	0.02
Off Line Finishing Booth (F-3)	FUKWD	n/a	82.50%	80.8%	1.70%	0.0%	17.50%	10.00	1.00	0.00	0.00	0.02	0.54	0.10	0.25	N/A	75%	0.01
Off Line Finishing Booth (F-4)	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	1.00	0.05	0.05	0.01	0.19	0.03	0.35	N/A	75%	0.02
Cleaning Agent	Mear Green	8.51	4.10%	0.0%	4.10%	0.0%	0.00%	10.00	6.00	0.35	0.35	0.33	7.80	1.42	11.66	N/A	65%	0.58
Coating Booth TG7-1	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	2.00	0.05	0.05	0.02	0.37	0.07	0.70	0.21	75%	0.04
Coating Booth TG7-2	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	2.00	0.05	0.05	0.02	0.37	0.07	0.70	0.21	75%	0.04
Coating Booth TG7-3	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	2.00	0.05	0.05	0.02	0.37	0.07	0.70	0.21	75%	0.04
Coating Booth TG7-4	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	3.00	0.05	0.05	0.02	0.56	0.10	1.05	0.21	75%	0.05
Coating Booth TG7-5	FKWD	8.35	75.75%	75.2%	0.59%	0.0%	23.72%	10.00	3.00	0.05	0.05	0.02	0.56	0.10	1.05	0.21	75%	0.05
Potential to Emit												8.92	213.97	39.05	59.88			2.99

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Weight % Organics * Material Usage (g/min/gun) * Number of Guns * (60 min/hr) * (1 lb/454 g)
 Potential VOC Pounds per Day = Weight % Organics * Material Usage (g/min/gun) * Number of Guns * (60 min/hr) * (24 hr/day)
 Potential VOC Tons per Year = Weight % Organics * Material Usage (g/min/gun) * Number of Guns * (60 min/hr) * (1 lb/454 g) * (8,760 hr/yr) * (1 ton/2,000 lbs)
 Particulate Potential Tons per Year = Material Usage (g/min/gun) * Number of Guns * (1-Transfer efficiency) * (60 min/hr) * (1 lb/454 g) * (8,760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 * Formerly VN surface coating line (VN-2SB)
 Note 1: CV Line 11 Spray Booth (CV-11Ex) has changed the coating to a coating with a lower VOC content. Despite increasing the number of guns the overall VOC has decreased as a result of this change.

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Controlled Particulate (ton/yr)
Off Line Finishing Booth (F-1)	K-540/Heptane Mixture (Wipe on primer)	N/A	97.75%	0.00%	97.75%	0.00%	3.00%	0.066	0.06	1.55	0.28	0	N/A	100.00%	0

Process	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (gram/unit)	Units per hour	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (lb/hr)	Particulate Potential (ton/yr)	Transfer Efficiency	Controlled Particulate (ton/yr)
Off Line Primer Downdraft Table (F-3-1)	FUWH	5.82	99.67%	0.0%	99.67%	0.0%	0.33%	1.50	4.40	0.01	0.35	0.06	0.00	0.00	75%	0.00

	VOC	Particulate
Unlimited Potential to Emit (tons/yr) =	69.94	87.68
Controlled Potential to Emit (tons/yr) =	69.94	4.40

METHODOLOGY

Emission calculations based on information provided in AA No. 087-28586-00031, issued on October 26, 2009.
 Potential VOC Pounds per Hour = Weight % Organics * Material Usage (lb/hr)
 Potential VOC Pounds per Day = Weight % Organics * Material Usage (lb/hr) * (24 hr/day)
 Potential VOC Tons per Year = Weight % Organics * Material Usage (lb/hr) * (8,760 hr/yr) * (1 ton/2,000 lbs)
 Particulate Potential Tons per Year = Material Usage (lb/hr) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations**

**Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman**

Process	Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Weight % Glycol Ethers	Weight % Ethylene Glycol	Weight % Xylene	Glycol Ethers Emissions (ton/yr)	Ethanol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAPs (ton/yr)
CV Line 5 Spray Booth (CV-5SB)	FKWA	8.35	0.93	0.00%	0.56%	0.00%	0.00	0.19	0.00	0.19
CV Line 6 Spray Booth (CV-6SB)	FKWA	8.35	0.93	0.00%	0.56%	0.00%	0.00	0.19	0.00	0.19
Line 7 Waterborne Urethane Coating Booth (CV-7SB)	FKWA	8.35	1.36	0.00%	0.56%	0.00%	0.00	0.28	0.00	0.28
L-Coat Glassline Spray Booths (LC-1SB1 & LC-1SB2)	F-UWG-HS/EMRALON 8370APA-HS (worst case coating)	9.20	2.01	0.00%	5.00%	0.00%	0.00	4.06	0.00	4.06
Off Line Finishing Booth (F-S)*	FKWA	8.35	0.003	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Potential to Emit							0.00	4.72	0.00	4.72

METHODOLOGY

Potential HAPs Tons per Year = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * (8760 hr/yr) * (1 ton/2000 lbs)

Process	Material	Density (Lb/Gal)	Material Usage (g/min/gun)	Number of Guns	Weight % Glycol Ethers	Weight % Ethanol	Weight % Xylene	Glycol Ethers Emissions (ton/yr)	Ethanol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAPs (ton/yr)
Urethane Application Spray Booth (CV-8SB)	FKWA	8.35	10.00	6.00	0.00%	0.56%	0.00%	0.00	0.19	0.00	0.19
Urethane Application Line (CV-9Ex)	FKWA	8.35	10.00	6.00	0.00%	0.56%	0.00%	0.00	0.19	0.00	0.19
CV Line 10 Spray booth (CV-10SB1)	FKWA	8.35	10.00	4.00	0.00%	0.56%	0.00%	0.00	0.13	0.00	0.13
CV Line 10 Spray booth (CV-10SB2)	FKWA	8.35	10.00	4.00	0.00%	0.56%	0.00%	0.00	0.13	0.00	0.13
CV Line 10 Spray booth (CV-11Ex)	FKWA	8.35	10.00	5.00	0.00%	0.56%	0.00%	0.00	0.16	0.00	0.16
CV Line 10 Spray booth (CV-12Ex)	FKWA	8.35	10.00	8.00	0.00%	0.56%	0.00%	0.00	0.26	0.00	0.26
CV Line 10 Spray booth (CV-13ex)	FKWA	8.35	10.00	8.00	0.00%	0.56%	0.00%	0.00	0.26	0.00	0.26
SDM Line 1 (EA) Spray Booth (SDM-1SB)	FUWT	8.46	10.00	6.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SDM Line 2 (EB) Spray Booth (SDM-2SB) MSM 33346)	FUWT	8.46	10.00	6.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SDM Line 3 (EC) Urethane Application Spray Booth (SDM-3SB)	FUWT	8.46	10.00	4.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SDM Line 4 (ED) Spray Booth (SDM-4SB)	FUWT	8.46	10.00	6.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SDM Line 5 (EE) Spray Booth (SDM-5SB)	FUWT	8.46	10.00	6.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Off Line Finishing Booth (F-1)	FKWD	8.35	10.00	1.00	0.53%	0.00%	0.40%	0.03	0.00	0.02	0.05
Off Line Finishing Booth (F-2)	FKWD	8.35	10.00	1.00	0.53%	0.00%	0.40%	0.03	0.00	0.02	0.05
Off Line Finishing Booth (F-3)	FUKWD	N/A	10.00	1.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Off Line Finishing Booth (F-4)	FKWD	8.35	10.00	1.00	0.53%	0.00%	0.40%	0.03	0.00	0.02	0.05
								0.09	1.33	0.07	1.49

Process	Material	Density (Lb/Gal)	Material Usage (g/min/gun)	Number of Guns	Weight % Glycol Ethers	Weight % Xylene	Glycol Ethers Emissions (tons/yr)	Xylene Emissions (tons/yr)	Total HAPs (tons/yr)
Coating Booth TG7-1	FKWD	8.35	10.00	2.00	0.10%	0.10%	0.01	0.01	0.02
Coating Booth TG7-2	FKWD	8.35	10.00	2.00	0.10%	0.10%	0.01	0.01	0.02
Coating Booth TG7-3	FKWD	8.35	10.00	2.00	0.10%	0.10%	0.01	0.01	0.02
Coating Booth TG7-4	FKWD	8.35	10.00	3.00	0.10%	0.10%	0.02	0.02	0.03
Coating Booth TG7-5	FKWD	8.35	10.00	3.00	0.10%	0.10%	0.02	0.02	0.03
							0.07	0.07	0.14

Glycol Ethers Emissions (ton/yr)	Ethanol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAPs (tons/yr)
0.16	6.05	0.14	6.35

Unlimited Potential to Emit (tons/yr) =

METHODOLOGY

Potential HAPs Tons per Year = Weight % HAP * Material Usage (g/min/gun) * Number of Guns * (60 min/hr) * (1 lb/454 g) * (8,760 hr/yr) * (1 ton/2,000 lbs)

Appendix A: Emission Calculations
Extrusion Lines

Company Name: Nishikawa Cooper, LLC
 Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
 Renewal Permit No.: 087-36530-00031
 Administrative Amendment No.: 087-37999-00031
 Reviewer: Nicholas Ellerman

Emission Unit	Potential Talc Throughput (lbs/hr)	Talc Transfer Efficiency	Control Efficiency	Uncontrolled		Controlled	
				Potential PM/PM10 Emissions (lbs/hr)	Potential PM/PM10 Emissions (tons/yr)	Potential PM/PM10 Emissions (lbs/hr)	Potential PM/PM10 Emissions (tons/yr)
CV Line 5 Dusters	2	75%	99%	0.50	2.2	0.01	0.02
CV Line 7 Duster	2	75%	0%	0.50	2.2	0.50	2.19
CV Line 11 Duster	2	75%	0%	0.50	2.2	0.50	2.19
Total				1.50	6.57	1.01	4.40

Note:

Talc is applied to extruded rubber in the dusters by dragging the hot, tacky rubber through a trough of talc. The talc adheres to the rubber and there are minimal emissions generated during the transfer of the talc to the rubber.

Potential Uncontrolled Emissions (lbs/hr) = Talc Throughput (lbs/hr) x (1 - Transfer Efficiency)

Potential Uncontrolled Emissions (tons/yr) = Potential Uncontrolled Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

Potential Controlled Emissions (lbs/hr) = Talc Throughput (lbs/hr) x (1 - Control Efficiency)

Potential Controlled Emissions (tons/yr) = Potential Controlled Emissions (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

Other Emissions from Rubber Parts Manufacturing

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM/PM10 Emission Factor (lbs/lb rubber)	PM/PM10 (lbs/hr)	PM/PM10 (tons/yr)	PM/PM10 Control Efficiency	PM/PM10 after controls (lbs/hr)	PM/PM10 after controls (tons/yr)
Extruding (CV-5Ex)	400	5.00E-04	0.2	0.876	1.89E-05	0.008	0.033	1.51E-08	6.04E-06	2.65E-05	0%	6.04E-06	2.65E-05
Extruding (CV-6Ex)	400	5.00E-04	0.2	0.876	1.89E-05	0.008	0.033	1.51E-08	6.04E-06	2.65E-05	0%	6.04E-06	2.65E-05
Extruding (CV-7Ex)	600	5.00E-04	0.3	1.314	1.89E-05	0.011	0.050	1.51E-08	9.06E-06	3.97E-05	0%	9.06E-06	3.97E-05
Extruding (CV-8Ex)	400	5.00E-04	0.2	0.876	1.89E-05	0.008	0.033	1.51E-08	6.04E-06	2.65E-05	0%	6.04E-06	2.65E-05
Extruding (CV-9Ex)	400	5.00E-04	0.2	0.876	1.89E-05	0.008	0.033	1.51E-08	6.04E-06	2.65E-05	0%	6.04E-06	2.65E-05
Extruding (CV-10Ex)	750	5.00E-04	0.375	1.643	1.89E-05	0.014	0.062	1.51E-08	1.13E-05	4.96E-05	0%	1.13E-05	4.96E-05
Extruding (CV-11Ex)	200	5.00E-04	0.1	0.438	1.89E-05	0.004	0.017	1.51E-08	3.02E-06	1.32E-05	0%	3.02E-06	1.32E-05
Extruding (CV-12Ex)	1300	3.51E-05	0.05	0.200	1.89E-05	0.025	0.108	1.51E-08	1.96E-05	8.60E-05	0%	1.96E-05	8.60E-05
Extruding (SDM-1Ex)	1342	5.00E-04	0.671	2.939	1.89E-05	0.025	0.111	1.51E-08	2.03E-05	8.88E-05	0%	2.03E-05	8.88E-05
Extruding (CV-13Ex) through CV-13Ex4)	1300	3.51E-05	0.046	0.200	1.89E-05	0.025	0.108	1.51E-08	1.96E-05	8.60E-05	0%	1.96E-05	8.60E-05
Rubber Extruding (SDM-2Ex) (MSM 33346)	1289	5.00E-04	0.6445	2.823	1.89E-05	0.024	0.107	1.51E-08	1.95E-05	8.53E-05	0%	1.95E-05	8.53E-05
Extruding (SDM-3Ex)	400	5.00E-04	0.2	0.876	1.89E-05	0.008	0.033	1.51E-08	6.04E-06	2.65E-05	0%	6.04E-06	2.65E-05
Extruding (SDM-4Ex)	1289	5.00E-04	0.6445	2.823	1.89E-05	0.024	0.107	1.51E-08	1.95E-05	8.53E-05	0%	1.95E-05	8.53E-05
Extruding (SDM-5Ex)	1289	5.00E-04	0.6445	2.823	1.89E-05	0.024	0.107	1.51E-08	1.95E-05	8.53E-05	0%	1.95E-05	8.53E-05
Plastic Extruding (LC-1Ex)*	38	5.00E-04	0.0190	0.083	1.89E-05	0.001	0.003	1.51E-08	5.74E-07	2.51E-06	0%	5.74E-07	2.51E-06
Rubber Extruding (LC-1Ex)	2183	5.00E-04	1.0915	4.781	1.89E-05	0.041	0.181	1.51E-08	3.30E-05	1.44E-04	0%	3.30E-05	1.44E-04
Plastic Extruding	602	5.00E-04	0.301	1.318	1.89E-05	0.011	0.050	1.51E-08	9.09E-06	3.98E-05	0%	9.09E-06	3.98E-05
Rubber Extruding (DHS) (AA 32511)	352	5.00E-04	0.176	0.771	1.89E-05	0.007	0.029	1.51E-08	5.32E-06	2.33E-05	0%	5.32E-06	2.33E-05
Hot Air Curing (CV-5C)	400	1.90E-03	0.760	3.33	9.76E-04	0.39	1.71	0	0	0	0%	0	0
Hot Air Curing (CV-6C1 and CV-6C2)	400	1.90E-03	0.760	3.33	9.76E-04	0.39	1.71	0	0	0	0%	0	0
Hot Air Curing (CV-7C)	600	1.90E-03	1.140	4.99	9.76E-04	0.59	2.56	0	0	0	0%	0	0
Hot Air Curing (CV-10C1 and CV-10C2)	750	1.90E-03	1.425	6.24	9.76E-04	0.73	3.21	0	0	0	0%	0	0
Hot Air Curing (CV-11C1 and CV-11C2)	200	1.90E-03	0.380	1.66	9.76E-04	0.20	0.85	0	0	0	0%	0	0
Hot Air Curing (CV-12)	1300	1.90E-03	2.470	10.82	9.76E-04	1.27	5.56	0	0	0	0%	0	0
Hot Air Curing (CV-13C1 through CV-13C6)	1300	1.90E-03	2.470	10.82	9.76E-04	1.27	5.56	0	0	0	0%	0	0
Hot Air Curing (SDM-1C1, SDM-1C2 and SDM-1C3)	1342	1.90E-03	2.550	11.17	9.76E-04	1.31	5.74	0	0	0	0%	0	0
Hot Air Curing (SDM-2C1) (MSM 33346)	1289	1.90E-03	2.449	10.73	9.76E-04	1.26	5.51	0	0	0	0%	0	0
Hot Air Curing (SDM-3C1)	400	1.90E-03	0.760	3.33	9.76E-04	0.39	1.71	0	0	0	0%	0	0
Hot Air Curing (SDM-4C1 and SDM-4C2)	1289	1.90E-03	2.449	10.73	9.76E-04	1.26	5.51	0	0	0	0%	0	0
Hot Air Curing (SDM-5C1 and SDM-5C2)	1289	1.90E-03	2.449	10.73	9.76E-04	1.26	5.51	0	0	0	0%	0	0
Hot Air Curing (LC-1C1)*	2183	1.90E-03	4.148	18.17	9.76E-04	2.13	9.33	0	0	0	0%	0	0
Hot Air Curing (DHS) (AA 32511)	352	1.90E-03	0.669	2.93	9.76E-04	0.34	1.50	0	0	0	0%	0	0
Mixing and Milling (Mix-1)	605	7.38E-05	0.045	0.196	5.58E-05	0.034	0.148	2.22E-04	0.134	0.59	98.00%	0.003	0.012
Totals:			31.0	135.7		13.1	57.3		0.135	0.59		0.003	0.013

Emission Factors from AP-42 draft Section 4.12, 2008. Emission factors for Compound #8 (EPDM 1) were used for hot air curing and mixing and milling. Emission factors for Compound #9 (EPDM 2) were used for extruding, because there is no emission factor for extruding Compound #8.

Unless otherwise noted VOC emission factor for extruding is derived from stack test results obtained by Wisconsin DNR for polyethylene plastic processing facilities.

* The plastic extruded in the plastic extrusion lines does not undergo curing.

The total speciated organic emission factors were used to calculate the potential VOC emissions from the hot air curing and mixing and milling processes. Per AP-42 Chapter 4.12 the total VOC emission factors were determined using Method 25A and are reported as methane. Therefore, the total speciated organic emission factors are more representative of the potential VOC emissions since these processes use materials that contain compounds that are heavier than methane.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

Hot Air Curing

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,3-Butadiene	1.24E-06	13,094	0.016	0.071
Acetophenone	2.13E-04	13,094	2.790	12.220
Aniline	1.48E-07	13,094	0.002	0.008
Benzene	4.88E-05	13,094	0.639	2.798
Biphenyl	3.92E-07	13,094	0.005	0.022
bis(2-Ethylhexyl)phthalate	2.74E-07	13,094	0.004	0.016
Carbon Disulfide	6.43E-04	13,094	8.426	36.904
Cumene	8.08E-08	13,094	0.001	0.005
Dibenzofuran	2.10E-06	13,094	0.027	0.120
Dimethylphthalate	3.19E-08	13,094	0.000	0.002
Hexane	3.13E-06	13,094	0.041	0.180
Xylenes	5.35E-05	13,094	0.700	3.067
Methylene Chloride	3.61E-06	13,094	0.047	0.207
Naphthalene	1.07E-06	13,094	0.014	0.061
Phenol	3.41E-07	13,094	0.004	0.020
Styrene	4.25E-07	13,094	0.006	0.024
Toluene	4.37E-06	13,094	0.057	0.251

6.43E-04

Emission factors for Compound #8 were used for hot air curing

Mixing and Milling

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,1,1-Trichloroethane	2.67E-08	605	0.00002	0.00007
1,1-Dichloroethene	1.00E-07	605	0.00006	0.00027
1,3-Butadiene	1.13E-07	605	0.00007	0.00030
1,4-Dichlorobenzene	4.48E-09	605	0.00000	0.00001
2-Butanone	5.08E-07	605	0.00031	0.00135
4-Methyl-2-Pentanone	1.27E-07	605	0.00008	0.00034
Acetophenone	1.29E-08	605	0.00001	0.00003
Acrylonitrile	6.81E-08	605	0.00004	0.00018
Aniline	7.70E-09	605	0.00000	0.00002
Cadmium (Cd) Compounds	9.09E-10	605	0.00000	0.00000
Carbon Disulfide	2.81E-05	605	0.01697	0.07433
Carbonyl Sulfide	2.24E-05	605	0.01358	0.05947
Chloromethane	3.74E-08	605	0.00002	0.00010
Chromium (Cr) Compounds	4.41E-09	605	0.00000	0.00001
Cumene	9.65E-08	605	0.00006	0.00026
Di-n-butylphthalate	7.47E-09	605	0.00000	0.00002
Ethylbenzene	1.11E-07	605	0.00007	0.00029
Hexane	1.28E-06	605	0.00077	0.00338
Isocane	2.46E-07	605	0.00015	0.00065
m-Xylene + p-Xylene	4.35E-07	605	0.00026	0.00115
Methylene Chloride	4.81E-07	605	0.00029	0.00127
Naphthalene	2.72E-08	605	0.00002	0.00007
Nickel (Ni) Compounds	3.38E-08	605	0.00002	0.00009
o-Xylene	1.55E-07	605	0.00009	0.00041
Phenol	3.19E-08	605	0.00002	0.00008
Styrene	4.12E-08	605	0.00002	0.00011
Tetrachloroethene	7.75E-08	605	0.00005	0.00021
Toluene	1.32E-06	605	0.00080	0.00349

Emission factors for Compound #8 were used for mixing and milling

Methodology

Emission Factors from AP-42 draft Section 4.12, 2008.

These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.

Potential Emissions (lb/hr) = Rubber (lb/hr) x EF (lb/lb rubber)

Potential Emissions (ton/yr) = Potential Emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)

Extruding

HAP	Worst Case Emission Factor	Potential Rubber Throughput	Potential Emissions	Potential Emissions
	(lb/lb rubber)	(lbs/hr)	(lbs/hr)	(tons/yr)
1,1,1-Trichloroethane	6.58E-08	14,534	0.0010	0.004
1,1-Dichloroethene	7.04E-08	14,534	0.0010	0.0045
1,3-Butadiene	6.01E-08	14,534	0.001	0.004
1,4-Dioxane	1.67E-07	14,534	0.00243	0.01065
2-Butanone	1.15E-07	14,534	0.002	0.007
2-Chloroacetophenone	3.83E-09	14,534	0.000	0.000
2-Methylphenol	9.28E-09	14,534	0.00013	0.00059
4-Methyl-2-Pentanone	2.85E-07	14,534	0.00414	0.0181
Acetophenone	8.18E-06	14,534	0.119	0.521
Acrolein	9.10E-08	14,534	0.001	0.01
Aniline	5.52E-09	14,534	0.000	0.000
Benzene	7.51E-08	14,534	0.001	0.005
Benzidine	1.26E-08	14,534	0.00018	0.0008
Biphenyl	3.27E-09	14,534	0.00005	0.00021
bis(2-Ethylhexyl)phthalate	6.70E-08	14,534	0.001	0.004
Carbon Disulfide	9.06E-08	14,534	0.001	0.006
Chloromethane	5.16E-08	14,534	0.001	0.003
Chromium (Cr) Compounds	7.82E-08	14,534	0.001	0.005
Cobalt (Co) Compounds	1.51E-08	14,534	0.000	0.001
Cumene	1.82E-06	14,534	0.026	0.116
Di-n-butylphthalate	3.65E-07	14,534	0.005	0.023
Dibenzofuran	2.51E-09	14,534	0.000	0.000
Dimethylphthalate	3.32E-09	14,534	0.000	0.000
Ethylbenzene	3.03E-08	14,534	0.000	0.002
Hexachlorobutadiene	1.72E-07	14,534	0.003	0.011
Hexane	8.38E-07	14,534	0.012	0.053
Isocane	2.36E-08	14,534	0.000	0.002
Isophorone	4.65E-09	14,534	0.000	0.000
m-Xylene + p-Xylene	1.53E-07	14,534	0.002	0.010
Methylene Chloride	2.69E-06	14,534	0.039	0.171
Naphthalene	1.96E-06	14,534	0.029	0.125
Nickel (Ni) Compounds	1.02E-07	14,534	0.001	0.006
o-Xylene	7.55E-08	14,534	0.001	0.005
Phenol	1.73E-07	14,534	0.003	0.011
Styrene	2.38E-08	14,534	0.000	0.002
Tetrachloroethene	7.39E-08	14,534	0.001	0.005
Toluene	8.95E-07	14,534	0.013	0.057

Emission factors for Compound #9 were used for extruding. There is no emission factor for extruding Compound #8.

**Appendix A: Emission Calculations
Extrusion Lines**

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

1. Process Description - CV-12/CV-13 Plasma Treat

Emission Unit ID	Rubber Throughput (lbs/hr)	Rubber Throughput (ton/hr)
CV-12PI	1,300	0.65
CV-13PI	1,300	0.65

2. Plasma Treat PTE Emissions

Data		
Air Velocity	500	ft/min
Nozzle Diameter	6	inches
NOx Concentration	400	ppm
Molecular Weight NOx	46.01	lb/lb-mol
Conversion Factor	60	min/hr
Conversion Factor	385.4	ft ³ /lb-mol

Calculation of Air Flow (cfm)

$$\text{Air velocity (ft/min)} = 576 * \text{air flow (cfm)} / (\pi * d^2)$$

$$\text{Air flow (cfm)} = \text{air velocity (ft/min)} * (\pi * d^2) / 576$$

$$\text{Air Flow for one plant} = 98.13 \text{ cfm}$$

$$\text{Total Air Flow} = 196.25 \text{ cfm}$$

Calculation of NOx emission rate (lb/hr)

Mass emissions are calculated based on measured concentration, molecular weight, and volumetric flow:

$$\text{NOx Emissions (lb/hr)} = [\text{NOx Concentration (PPMV)} / 1,000,000] * \text{NOx MW (lb/lb-mol)} / 385.4 \text{ (ft}^3\text{/lb-mol)} * \text{Air Flow (cfm)} * 60 \text{ (min/hr)}$$

Total NOx Emissions = 0.56 lb/hr
2.46 tons/yr

hand wiping operation

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Volatiles (organic, water and exempt solvents)	Weight % Water	Weight % Organics	Volume % Non-Volatiles (solids)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
MCH	6.42	100.00%	52.5%	0.00%	100.0%	0.00%	0.76	6.42	0.76	18.24	3.33	0.00	100%

$$\text{Potential VOC tons per year} = \text{Material Usage (lb/hr)} * \text{Weight \% Organics} * \text{Density (Lb/Gal)} * [8760 \text{ (hrs/yr)} / 2000 \text{ (lbs/ton)}]$$

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

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

1. Process Description

Emission Unit ID	Heat Input Capacity (MMBtu/hr)
CV-5C, CV-6C1, CV-C, CV-8C1, CV-8C2, CV-9C1, and CV-9C2 (7 ovens each rated at 1.59 MMBtu/hr)	11.13
CV-10C1 (2 cure ovens each at 0.15 MMBtu/hr)	0.30
CV-10C2 (4 burners each at 0.2 MMBtu/hr)	0.80
CV-11C2 and CV-11C3 (2 ovens each rated at 0.5 MMBtu/hr)	1.00
CV-12 (6 ovens)	4.54
SDM-1C1, SDM-1C2, SDM-4C1, and SDM-5C1 (6 cure ovens each rated at 0.143 MMBtu/hr)	0.86
SDM-C3, SDM-4C2, and SDM-5C2 (6 burners each rated at 0.85 MMBtu/hr)	5.10
SDM-1C4, SDM-4C3, and SDM-5C3 (6 burners each rated at 0.34 MMBtu/hr)	2.04
SDM-3MH	1.19
SDM-3C1	1.99
SDM-3C2	1.00
SDM-4MH and SDM-5MH (4 burners each rated at 0.375 MMBtu/hr)	1.50
LC-1C1 (8 burners each rated at 0.782 MMBtu/hr)	6.26
LC-1C2 (6 burners each rated at 0.086 MMBtu/hr)	0.52
LC-1MW1 and LC1MW2 (4 burners each rated at 0.205 MMBtu/hr) (AA 31713)	0.82
DHS (AA 32511)	1.19
Two (2) Annealing Line Ovens (each rated at 0.5 MMBtu/hr) (33069 AA)	1.00
SDM-2 (SDM-2MH, SDM-2C1, SDM-2C2, SDM-2C3, SDM-2C4) (33346 MSM)	3.89
natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	4.51
Total	49.63

2. Combustion Emissions - Criteria Pollutants

NOx Burner Type	Fuel Heat Value (MMBtu/MMCF)	Emission Factor (lbs/MMCF)						
		PM*	PM10*	direct PM2.5	SO ₂	NOx**	VOC	CO
Ordinary Burners	1,020	1.9	7.6	7.6	0.6	100	5.5	84.0

* PM emission factor is for filterable PM only. PM10 emission factor is for condensable PM10 and filterable PM combined.

** Emission factors for NOx: Uncontrolled = 100 lbs/MMCF, Low NOx Burners = 50 lbs/MMCF

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC 1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03. (7/98)

Emission Unit ID	Potential Throughput (MMCF/yr)	Potential To Emit (tons/yr)						
		PM	PM10	direct PM2.5	SO ₂	NOx	VOC	CO
CV-5C, CV-6C1, CV-C, CV-8C1, CV-8C2, CV-9C1, and CV-9C2 (7 ovens each rated at 1.59 MMBtu/hr)	95.59	0.09	0.36	0.36	0.03	4.78	0.26	4.01
CV-10C1 (2 cure ovens each at 0.15 MMBtu/hr)	2.58	0.00	0.01	0.01	0.001	0.13	0.01	0.11
CV-10C2 (4 burners each at 0.2 MMBtu/hr)	6.87	0.007	0.03	0.03	0.002	0.34	0.02	0.29
CV-11C2 and CV-11C3 (2 ovens each rated at 0.5 MMBtu/hr)	8.59	0.01	0.03	0.03	0.00	0.43	0.02	0.36
CV-12 (6 ovens)	38.96	0.04	0.15	0.15	0.01	1.95	0.11	1.64
SDM-1C1, SDM-1C2, SDM-4C1, and SDM-5C1 (6 cure ovens each rated at 0.143 MMBtu/hr)	7.37	0.007	0.028	0.028	0.0022	0.37	0.020	0.31
SDM-C3, SDM-4C2, and SDM-5C2 (6 burners each rated at 0.85 MMBtu/hr)	43.80	0.042	0.17	0.17	0.013	2.19	0.12	1.84
SDM-1C4, SDM-4C3, and SDM-5C3 (6 burners each rated at 0.34 MMBtu/hr)	17.52	0.017	0.07	0.07	0.005	0.88	0.05	0.74
SDM-3MH	10.22	0.010	0.04	0.04	0.003	0.51	0.03	0.43
SDM-3C1	17.09	0.016	0.06	0.06	0.005	0.85	0.05	0.72
SDM-3C2	8.59	0.008	0.03	0.03	0.003	0.43	0.02	0.36
SDM-4MH and SDM-5MH (4 burners each rated at 0.375 MMBtu/hr)	12.88	0.012	0.05	0.05	0.004	0.64	0.04	0.54
LC-1C1 (8 burners each rated at 0.782 MMBtu/hr)	53.73	0.051	0.20	0.20	0.016	2.69	0.15	2.26
LC-1C2 (6 burners each rated at 0.086 MMBtu/hr)	4.43	0.004	0.02	0.02	0.001	0.22	0.01	0.19
rubber extruders (CV-12Ex1 through CV-13ex4)	7.04	0.007	0.03	0.03	0.002	0.35	0.02	0.30
DHS (AA 32511)	10.20	0.010	0.04	0.04	0.003	0.51	0.03	0.43
Two (2) Annealing Line Ovens (each rated at 0.5 MMBtu/hr) (33069 AA)	8.59	0.008	0.03	0.03	0.003	0.43	0.02	0.36
SDM-2 (SDM-2MH, SDM-2C1, SDM-2C2, SDM-2C3, SDM-2C4) (33346 MSM)	33.42	0.032	0.13	0.13	0.010	1.67	0.09	1.40
natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	38.73	0.037	0.15	0.15	0.012	1.94	0.11	1.63
Total	426.19	0.40	1.62	1.62	0.13	21.31	1.17	17.90

Methodology

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

Potential To Emit (tons/year) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion Only
Continued

3. Combustion Emissions - HAP Pollutants

Emission Factor (lbs/MMCF)										
Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel	
2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	3.8E-04	2.6E-04	2.1E-03	
Potential To Emit (tons/yr)										
Emission Unit ID	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel
CV-5C, CV-6C1, CV-C, CV-8C1, CV-8C2, CV-9C1, and CV-9C2 (7 ovens each rated at 1.59 MMBtu/hr)	1.00E-04	5.74E-05	3.58E-03	8.60E-02	1.62E-04	5.26E-05	6.69E-05	1.82E-05	1.24E-05	1.00E-04
CV-10C1 (2 cure ovens each at 0.15 MMBtu/hr)	2.71E-06	1.55E-06	9.66E-05	2.32E-03	4.38E-06	1.42E-06	1.80E-06	4.90E-07	3.35E-07	2.71E-06
CV-10C2 (4 burners each at 0.2 MMBtu/hr)	7.21E-06	4.12E-06	2.58E-04	6.18E-03	1.17E-05	3.78E-06	4.81E-06	1.31E-06	8.93E-07	7.21E-06
CV-11C2 and CV-11C3 (2 ovens each rated at 0.5 MMBtu/hr)	9.02E-06	5.15E-06	3.22E-04	7.73E-03	1.46E-05	4.72E-06	6.01E-06	1.63E-06	1.12E-06	9.02E-06
CV-12 (6 ovens)	4.09E-05	2.34E-05	1.46E-03	3.51E-02	6.62E-05	2.14E-05	2.73E-05	7.40E-06	5.06E-06	4.09E-05
SDM-1C1, SDM-1C2, SDM-4C1, and SDM-5C1 (6 cure ovens each rated at 0.143 MMBtu/hr)	7.74E-06	4.42E-06	2.76E-04	6.63E-03	1.25E-05	4.05E-06	5.16E-06	1.40E-06	9.58E-07	7.74E-06
SDM-C3, SDM-4C2, and SDM-5C2 (6 burners each rated at 0.85 MMBtu/hr)	4.60E-05	2.63E-05	1.64E-03	3.94E-02	7.45E-05	2.41E-05	3.07E-05	8.32E-06	5.69E-06	4.60E-05
SDM-1,C4, SDM-4C3, and SDM-5C3 (6 burners each rated at 0.34 MMBtu/hr)	1.84E-05	1.05E-05	6.57E-04	1.58E-02	2.98E-05	9.64E-06	1.23E-05	3.33E-06	2.28E-06	1.84E-05
SDM-3MH	1.07E-05	6.13E-06	3.83E-04	9.20E-03	1.74E-05	5.62E-06	7.15E-06	1.94E-06	1.33E-06	1.07E-05
SDM-3C1	1.79E-05	1.03E-05	6.41E-04	1.54E-02	2.91E-05	9.40E-06	1.20E-05	3.25E-06	2.22E-06	1.79E-05
SDM-3C2	9.02E-06	5.15E-06	3.22E-04	7.73E-03	1.46E-05	4.72E-06	6.01E-06	1.63E-06	1.12E-06	9.02E-06
SDM-4MH and SDM-5MH (4 burners each rated at 0.375 MMBtu/hr)	1.35E-05	7.73E-06	4.83E-04	1.16E-02	2.19E-05	7.09E-06	9.02E-06	2.45E-06	1.67E-06	1.35E-05
LC-1C1 (8 burners each rated at 0.782 MMBtu/hr)	5.64E-05	3.22E-05	2.01E-03	4.84E-02	9.13E-05	2.96E-05	3.76E-05	1.02E-05	6.98E-06	5.64E-05
LC-1C2 (6 burners each rated at 0.086 MMBtu/hr)	4.65E-06	2.66E-06	1.66E-04	3.99E-03	7.53E-06	2.44E-06	3.10E-06	8.42E-07	5.76E-07	4.65E-06
LC-1MW1 and LC1MW2 (4 burners each rated at 0.205 MMBtu/hr) (AA 31713)	7.39E-06	4.23E-06	2.64E-04	6.34E-03	1.20E-05	3.87E-06	4.93E-06	1.34E-06	9.18E-07	7.39E-06
DHS (AA 32511)	1.07E-05	6.12E-06	3.83E-04	9.18E-03	1.73E-05	5.61E-06	7.14E-06	1.94E-06	1.33E-06	1.07E-05
Two (2) Annealing Line Ovens (each rated at 0.5 MMBtu/hr) (33069 AA)	9.02E-06	5.15E-06	3.22E-04	7.73E-03	1.46E-05	4.72E-06	6.01E-06	1.63E-06	1.12E-06	9.02E-06
SDM-2 (SDM-2MH, SDM-2C1, SDM-2C2, SDM-2C3, SDM-2C4) (33346 MSM)	3.51E-05	2.01E-05	1.25E-03	3.01E-02	5.68E-05	1.84E-05	2.34E-05	6.35E-06	4.34E-06	3.51E-05
natural gas-fired rubber curing ovens (CV-13C1 through CV-13C6)	4.07E-05	2.32E-05	1.45E-03	3.49E-02	6.58E-05	2.13E-05	2.71E-05	7.36E-06	5.04E-06	4.07E-05
Total	4.07E-04	2.32E-04	1.45E-02	3.49E-01	6.59E-04	2.13E-04	2.71E-04	7.36E-05	5.04E-05	4.07E-04

HAP emission factors are from AP 42, Chapter 1.4, Tables 1.4-3 and 1.4-4. (7/98)

Methodology

Potential To Emit (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Total HAP =	0.37
Highest Single HAP =	0.35
	Hexane

**Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines**

**Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman**

Maximum Output Horsepower Rating (hp)	50
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)	7500
Maximum Hours Operated per Year (hr/yr)	500
Potential Fuel Usage (MMBtu/yr)	188
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	0.18

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	7.23E-06	9.36E-04	9.36E-04	5.51E-05	0.38	0.01	0.03

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	7.84E-04
Acrolein	5.14E-03	4.82E-04
Benzene	4.40E-04	4.13E-05
Biphenyl	2.12E-04	1.99E-05
1,3-Butadiene	2.67E-04	2.50E-05
Formaldehyde	5.28E-02	4.95E-03
Methanol	2.50E-03	2.34E-04
Hexane	1.10E-03	1.03E-04
Toluene	4.08E-04	3.83E-05
2,2,4-Trimethylpentane	2.50E-04	2.34E-05
Xylene	1.84E-04	1.73E-05
Total		6.72E-03

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

**Appendix A: Emission Calculations
SDM-4Ex Rubber Extruder addition**

Company Name: Nishikawa Cooper, LLC
Address City IN Zip: 324 Morrow Street, Topeka, IN 46571
Renewal Permit No.: 087-36530-00031
Administrative Amendment No.: 087-37999-00031
Reviewer: Nicholas Eilerman

1. Process Description - SDM Line 4 (ED) New Rubber Extruder

Emission Unit ID	Rubber Throughput (lbs/hour)	Rubber Throughput (tons/hour)
Fifth Extruder on SDM-4Ex	322.25	0.16

2. Rubber Extrusion PTE Emissions

Emission Factor (lbs./lb rubber)		
PM/PM10	VOC	HAPs
1.51E-08	3.51E-05	1.89E-05

Emission Factors from AP-42 draft Section 4.12, 2008.

Emission factors for Compound #9 were used for extruding, because there is no emission factor for extruding Compound #8.

The total speciated organic emission factor were used to calculate the potential VOC emissions from extruding.

Emission Unit ID	PM/PM10 (lbs./hour)	PM/PM10 (tons/year)	326 IAC 6-3-2 allowable emission rate (lbs./hour)	VOC (lbs/hr)	VOC (tons/yr)	HAPs (lbs/hr)	HAPs (tons/yr)	Worst Single HAP Acetophenone (tons/yr)
Fifth Extruder on SDM-4Ex	4.87E-06	2.1313E-05	Exempt 326 IAC 6-3-1(b)(14)	0.011	0.050	0.006	0.027	0.012
				0.011	0.050	0.006	0.027	0.012

Fifth Extruder on SDM-4Ex			
Speciated HAP	Emission Factor (lb/lb rubber)	PTE (lbs/hour)	PTE (tons/year)
1,1,1-Trichloroethane	6.58E-08	2.12E-05	9.28E-05
1,1-Dichloroethene	7.04E-08	2.27E-05	9.94E-05
1,3-Butadiene	6.01E-08	1.94E-05	8.49E-05
1,4-Dioxane	1.67E-07	5.39E-05	2.36E-04
2-Butanone	1.15E-07	3.71E-05	1.62E-04
2-Chloroacetophenone	3.83E-09	1.23E-06	5.41E-06
2-Methylphenol	9.28E-09	2.99E-06	1.31E-05
4-Methyl-2-Pentanone	2.85E-07	9.17E-05	4.02E-04
Acetophenone	8.18E-06	2.64E-03	1.15E-02
Acrolein	9.10E-08	2.93E-05	1.28E-04
Aniline	5.52E-09	1.78E-06	7.79E-06
Benzene	7.51E-08	2.42E-05	1.06E-04
Benzidine	1.26E-08	4.05E-06	1.77E-05
Biphenyl	3.27E-09	1.05E-06	4.61E-06
bis(2-Ethylhexyl)phthalate	6.70E-08	2.16E-05	9.46E-05
Carbon Disulfide	9.06E-08	2.92E-05	1.28E-04
Chloromethane	5.16E-08	1.66E-05	7.29E-05
Chromium (Cr) Compounds	7.82E-08	2.52E-05	1.10E-04
Cobalt (Co) Compounds	1.51E-08	4.87E-06	2.13E-05
Cumene	1.82E-06	5.87E-04	2.57E-03
Di-n-butylphthalate	3.65E-07	1.17E-04	5.15E-04
Dibenzofuran	2.51E-09	8.08E-07	3.54E-06
Dimethylphthalate	3.32E-09	1.07E-06	4.69E-06
Ethylbenzene	3.03E-08	9.75E-06	4.27E-05
Hexachlorobutadiene	1.72E-07	5.56E-05	2.43E-04
Hexane	8.38E-07	2.70E-04	1.18E-03
Isooctane	2.36E-08	7.62E-06	3.34E-05
Isophorone	4.65E-09	1.50E-06	6.56E-06
m-Xylene + p-Xylene	1.53E-07	4.92E-05	2.16E-04
Methylene Chloride	2.69E-06	8.68E-04	3.80E-03
Naphthalene	1.96E-06	6.32E-04	2.77E-03
Nickel (Ni) Compounds	1.02E-07	3.28E-05	1.43E-04
o-Xylene	7.55E-08	2.43E-05	1.07E-04
Phenol	1.73E-07	5.57E-05	2.44E-04
Styrene	2.38E-08	7.67E-06	3.36E-05
Tetrachloroethene	7.39E-08	2.38E-05	1.04E-04
Toluene	8.95E-07	2.88E-04	1.26E-03

These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.

Potential Emissions (lb/hr) = Rubber (lb/hr) x EF (lb/lb rubber)

Potential Emissions (ton/yr) = Potential Emissions (lb/hr) x 8760 (hr/yr) / 2000 (lb/ton)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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TO: Michael Hough
Nishikawa Cooper LLC
324 Morrow Street
Topeka, IN 46571

DATE: February 10, 2017

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Title V Administrative Amendment
087-37999-00031

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because 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.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Steve Folden, Plant Manager
Mrs. Kathy Moore, Keramida Environmental, Inc.
OAQ Permits Branch Interested Parties List

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, 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.dot 1/9/2017

Mail Code 61-53

IDEM Staff	VHAUN 2/10/2017 Nishikawa Cooper LLC 087-37999-00031 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		

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1		Michael Hough Nishikawa Cooper LLC 324 Morrow Street Topeka IN 46571 (Source CAATS) VIA UPS										
2		Steve Folden Plant Manager Nishikawa Cooper LLC 324 Morrow Street Topeka IN 46571 (RO CAATS)										
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		Topeka Town Council P.O. Box 127 Topeka IN 46571 (Local Official)										
5		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
7		Mrs. Kathy Moore Keramida Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant)										
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