PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Uniroyal Goodrich Tire Manufacturing
US Highway 24 East
Woodburn, Indiana 46797

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

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

Operation Permit No.: T003-5974-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

D.3 FACILITY OPERATION CONDITIONS - scrap incinerator

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

D.3.1 Incinerator [326 IAC 4-2-2]

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.4 FACILITY OPERATION CONDITIONS - tread end cementing, green tire spraying

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

D.4.1 Volatile Organic Compound (VOC) Limitation [40 CFR 60.540, Subpart BBB]
D.4.2 Volatile Organic Compound (VOC) Limitation
D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

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

D.4.5 Record Keeping Requirements
D.4.6 Reporting Requirements

D.5 FACILITY CONDITIONS - component preparation, tire building, miscellaneous solvent usage

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

D.5.1 VOC or PM Limitations

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.6 FACILITY OPERATION CONDITIONS - Insignificant Activities

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

D.6.1 Degreaser
D.6.2 Particulate Matter Limitation (PM) [326 IAC 6-3-2]
D.6.3 Volatile Organic Compound (VOC) Limitation [40 CFR 60.540, Subpart BBB]

Compliance Determination Requirements

D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Certification
Emergency/Deviation Occurrence Report
Quarterly Report
Quarterly Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

The Permittee owns and operates a tire manufacturer.

Responsible Official:	D. J. Brenner
Source Address:	18906 US Highway 24 East, Woodburn, Indiana 46797
Mailing Address:	P.O. Box 277, Woodburn, Indiana 46797-0277
Phone Number:	219-493-8117
SIC Code:	3011
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) carbon black unloading area, with a maximum capacity of 7621 pounds per hour, using a baghouse as control, exhausting at stacks 356 A - D;

(b) One (1) Banbury mixing area, with a maximum capacity of 27,146 pounds of rubber, carbon black, and chemicals per hour, using a baghouse as control, exhausting at stacks 200, 208, 210, 231 and 278;

(c) Five (5) natural gas or No. 2/No. 6 fuel oil or fuel oil blend fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257;

(d) One (1) natural gas scrap incinerator, with a maximum capacity of 3.0 MM Btu/hr and 2,400 pounds of scrap per hour, using no control, exhausting at stacks 281, 282;

(e) One (1) component preparation area, which includes milling, extruding, and calendering with a maximum capacity of 35,400 pounds per hour, using no control, exhausting at stacks 168, 171, 173, 174, 176, 178, 186, 187, 254, 255, 311, 315, 318, 319, 320, 322, 323, 324, 325, 326, 327, 328, 329, 330, and 355;

(f) One (1) tire building area, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 301-309, 312, and 313;

(g) One (1) tire curing process, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 51-58, 60-66, 68, 69, 71, 73, 75, 77, 79, 80, and 82-88;

(h) One (1) WSW grinding and TUO Module Area, with a maximum capacity of 28,378 pounds per hour, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277,

(i) One (1) tread end cementing process consisting of lines #1 and #2, with a production capacity of 2,081 tires per hour, using particulate baffle filters, exhausting at stacks 158, and 159;

(j) Miscellaneous solvent usage.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(2) One (1) green tire spray operation, with a maximum capacity of 35,400 pound per hour, using particulate baffle filters, exhausting at stacks 130, 132, 145, 262, 263, 264, 279, and 280.

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 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

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

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

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

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

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

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

(5) Any insignificant activity that has been added without a permit revision; and

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

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each 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;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 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, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.

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

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, 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.

(d) 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.

(e) 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.

(f) 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).

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

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

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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 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)]

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

(1) That this permit contains a material mistake.

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

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

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(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, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. 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(40).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(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.20 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 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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

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

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b)

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 approval required by 326 IAC 2-1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

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

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) 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.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour 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 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity emissions 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%) opacity 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

(b) The Permittee shall 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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 the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. In the case of continuous opacity monitoring, whenever the continuous opacity monitor is malfunctioning or will be down for repairs or adjustments for a period of four (4) hours or more, visible emission observations should be performed for a minimum of one (1) hour, as described in D.1.5, and should be implemented at least once per daylight shift during process operations, until such time that the continuous opacity monitor is back in operation. The VE readings during this period shall be reported to the air compliance inspector.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

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

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

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

C.13 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 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]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semiannually Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semiannual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) carbon black unloading area, with a maximum capacity of 7621 pounds per hour, using a baghouse as control, exhausting at stacks 356 A - D;

(b) One (1) Banbury mixing area, with a maximum capacity of 27,146 pounds of rubber, carbon black, and chemicals per hour, using a baghouse as control, exhausting at stacks 200, 208, 210, 231, and 278;

(c) One (1) WSW grinding and TUO Module Area, with a maximum capacity of 28,378 pounds per hour, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277.

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

D.1.1 Particulate Matter (PM) Limitations [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from:

(a) Carbon black unloading shall not exceed 10.05 pounds per hour when operating at a process weight rate of 7621 pounds per hour,

(b) Banbury mixing shall not exceed 23.5 pounds per hour when operating at a process weight rate of 27,146 pounds per hour,

(c) WSW grinding and TUO Module Area shall not exceed 24 pounds per hour when operating at a process weight rate of 28,378 pounds per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), the dust collectors, baghouses, cyclones, and dry filters for PM control shall be in operation at all times when the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area are in operation.

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

D.1.5 Monitoring

(a) The carbon black unloading has applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the carbon black unloading stack exhausts, 356A, 356B, 356C, 356D, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the carbon black baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the range of 6.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.

(3) An inspection shall be performed semi-annually of all bags controlling the carbon black unloading operation when venting to the atmosphere. A baghouse inspection shall be performed within six months of redirecting vents to the atmosphere and every six months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(4) In the event that bag failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(b) The Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing has applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing processes stack exhausts, 200, 208, 210,231, and 278 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the ranges of 4.0 to 8.0, 4.0 to 8.0, and 2.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.

(3) An inspection shall be performed semi-annually of all bags controlling the mixing operation when venting to the atmosphere. A baghouse inspection shall be performed within six months of redirecting vents to the atmosphere and every six months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced

(4) In the event that bag failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(c) The WSW grinding and TUO Module Area have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the WSW grinding and TUO Module Area and Quality assurance processes stack exhausts, 258-261, and 265-277, and 33 and 37, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.5, the Permittee shall maintain records of daily visible emission notations of the carbon black unloading, Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing, WSW grinding and TUO Module Area stack exhausts.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:

(1) Monthly records of trip checks of the failsafe pressure switches monitoring the carbon black and the Banbury mixing, BB dump and pellet feed for Banbury mixing baghouses differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Five (5) natural gas / No. 6/No. 2 fuel oil blend fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257.

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

D.2.1 Sulfur Dioxide (SO_2) Emissions Limitations [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the five (5) natural gas or No. 6/No. 2 fuel oil fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257 shall each not exceed:

(a) one and six tenths (1.6) pounds per MMBtu heat input when combusting No. 6 fuel oil, or

(b) five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil.

D.2.2 PM Emissions Limitations [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) from the boilers, identified as #1 through #5, shall be limited by the following:

$Pt = C \times a \times h/76.5 \times Q^{0.75} \times N^{0.25}$ where Pt = pounds of particulate matter emitted per MMBtu

(a) Each Boiler #1, #2, #3, or #4 shall not exceed 0.61 pounds of PM per MM Btu, and

(b) Boiler #5 shall not exceed 0.45 pounds of PM per MM Btu.

Compliance Determination Requirements

D.2.3 Compliance Schedule for Combustion of Boiler No. 6 Fuel Oil with Excess Sulfur Content

Final resolutions regarding violations from combustion of the Boiler Fuel Oil with excess sulfur content will be address through a later Agreed Order or Commissioner's Order, which will provide for appropriate civil penalties, the following interim steps should be taken regarding the Boiler Fuel Oil Currently at the Woodburn Plant:

(a) The Permittee shall utilize as fuel all present contents of the day tank, now containing approximately 75,000 gallons of fuel oil with a sulfur content of 1.64%. After the tank is emptied, Uniroyal shall not allow any fuel oil with a sulfur content exceeding 1.528% to be placed in the tank.

(b) The Permittee shall add 600,000 gallons of fuel oil with a sulfur content of 1.34% to the large storage tank, and use the tank heaters to provide thermal drafting to blend the oils. Data shall be submitted showing when this fuel oil was added, and that its sulfur content complies with these requirements, to Mr. Brian Eaton at the above address. This data shall be submitted prior to using the blended oil in the large storage tank as fuel.

(c) The Permittee shall continue blending the oils for at least ten (10) days after the last of the additional 600,000 gallons of fuel oil is added, before any fuel oil from the large storage tank is used as fuel.

(d) The Permittee shall take daily samples of the blended fuel oil in the large storage tank and analyze the samples for sulfur content. Fuel oil from the large storage tank shall not be used until five consecutive daily samples show a sulfur content of 1.528% or less. Uniroyal shall not begin using the fuel oil if blending has not continued for ten days since the last of the additional fuel oil was added to the large storage tank, even if five (5) consecutive daily samples show compliance with the sulfur content requirement.

(e) After sampling has demonstrated compliance with the requirements in paragraph (d), sampling sampling of the fuel oil shall be conducted weekly instead of daily, until this requirement is modified by a final order resolving IDEM's enforcement action regarding combustion of Boiler Fuel Oil with excess sulfur content.

(f) The Permittee shall maintain records of its fuel oil sampling and its analysis of the fuel oil sulfur content for at least two years from the date of sampling. A record shall be maintained of the sampling procedure used for taking fuel oil samples. These records shall be kept on-site and made available to IDEM upon request.

(g) After blending has continued for at least ten (10) days, and sampling has demonstrated compliance with the requirements in paragraph (d), the Permittee shall not allow any fuel oil with a sulfur content exceeding 1.528% to be placed in the large storage tank.

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) Within sixty days of the completed rebuild of Boiler #5, stack testing for opacity when burning No. 6 fuel oil shall be performed. Compliance shall be determined by a performance stack test conducted in accordance with Section C - Performance Testing. The Permittee shall perform opacity testing utilizing Method 8 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The opacity testing shall be repeated at least once every two and one half (2 1/2) years from the date of this valid compliance demonstration.

(b) Within thirty days of the completed rebuild of Boiler #4, compliance with the opacity limitation in Condition C.2 shall be determined by a performance stack test conducted in accordance with Section C - Performance Testing. The Permittee shall perform opacity testing utilizing Method 8 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The opacity testing shall be repeated at least once every two and one half (2 1/2) years from the date of this valid compliance demonstration.

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed one and five tenths percent (1.5%) by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the five boilers #1 through #5, using 40 CFR 60, Appendix A, Method 8 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations only when combusting fuel oil or fuel oil/natural gas blend and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
One (1) natural gas scrap incinerator, with a maximum capacity of 3 MM Btu/hr, burning 1,568 pounds of scrap per hour, using no control, exhausting at stacks 281, 282.

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

D.3.1 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), this natural gas incinerator, rated at 3 MM Btu/hr shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning wood products.

(c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

(d) Be maintained properly as specified by the manufacturer and approved by IDEM.

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.

(g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.

(h) Not create a nuisance or a fire hazard.

(i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 (i) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(a) One (1) tread end cementing process, with a maximum capacity of 2,081 tires per hour, using particulate baffles, exhausting at stacks 157, 158, and 159.

Insignificant Activity
(b) One (1) green tire spray, with a maximum capacity of 35,400 pound per hour, using particulate baffles, exhausting at stacks 130, 132, 145, 262, 263, 264, 279, and 280.

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

D.4.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart BBB.

D.4.2 Rubber Tire Manufacturing Industry NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart BBB]

This facility is subject to 40 CFR 60, Subpart BBB, which is incorporated by reference in 326 IAC 12-1-1. A copy of the rule is attached.

(a) For the tread end cementing operation, the Permittee shall discharge into the atmosphere no more than 10 grams of volatile organic compounds (VOC) per tire (g/tire) cemented for each month. (The source complies by using a cement with 4 grams of VOC per tire.)

(b) For the green tire spraying operation using water-based sprays,

(1) the Permittee shall discharge into the atmosphere no more than 1.2 grams of VOC per tire sprayed with an inside green tire spray for each month (the source complies by using an inside green tire spray containing 0 grams of VOC per tire.); and

(2) the Permittee shall discharge into the atmosphere no more than 9.3 grams of VOC per tire sprayed with an outside green tire spray for each month. (The source complies by using a outside green tire spray containing 0 grams of VOC per tire.)

D.4.3 Particulate Matter Limitation (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the green tire spraying and the tread end cementer shall be limited by the following:
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), the particulate for PM control shall be in operation at all times when the tread end cementing or the green tire spraying is in operation.

D.4.7 Compliance Provisions NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart BBB]

(a) To determine compliance with Condition D.4.2, the Permittee shall:

(1) Determine the density and weight fraction VOC as specified under §60.543(c)(1).

(2) Calculate the total mass of VOC used at the affected facility for the month (M_0) as specified under §60.543(c)(2).

(3) Determine the total number of tires cemented at the affected facility for the month (T_0) by the following procedure:

(A) For a tread end cementing operation, T_0 equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.

(4) Calculate the mass of VOC used per tire cemented at the affected facility for the month (G):
$G = M_0 / T_0$

(5) Calculate the mass of VOC emitted per tire cemented at the affected facility for the month (N):
$N = G$

(b) To determine compliance with Condition D.4.1 (b), the Permittee shall submit formulation data or the results of Method 24 analysis to verify the VOC content of each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under §60.546(j).

(c) In determining compliance of each tread end cementing operation, the Permitee shall include only those tires defined under §60.541(a) when determining T_0 and B_0.

Record Keeping and Reporting Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 60, Subpart BBB]

D.4.8 Record Keeping Requirements

(a) To document compliance with Conditions D.4.2 (a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2 and D.4.3.

(1) The amount of VOC content of the cement used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each year;

(4) The total VOC usage for each month; and

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

(b) To document compliance with D.4.5 (b), the Permittee shall maintain an MSDS record or the results of Method 24 analysis conducted to verify the VOC content of the spray on site.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

(a) A semi-annual summary of the information to document compliance with Condition D.4.1 concerning tread end cementing shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) months being reported.

(b) An annual summary of the information used to document compliance with Condition D.4.5 (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the year being reported.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) component preparation area, which includes milling, extruding, and calendering with a maximum capacity of 35,400 pounds per hour, using no control, exhausting at stacks168, 171, 173, 174, 176, 178, 186, 254, 255, 318, 319, 322, 323, 325, 326, 327, 329, 330, 355, 311, 315, 320, 324, and 328;

(b) One (1) tire building area, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 301-309, 312, and 313;

(c) Miscellaneous solvent usage.

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

D.5.1 VOC or PM Limitations

There are no VOC or PM limitations based on the potential emissions in these areas, but any change or modification which may increase the potential emissions from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activity
(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.	

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

D.6.1 Degreaser [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirement

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if a facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Uniroyal Goodrich Tire Manufacturing
Source Address: 18906 U.S. Highway 24 East, Woodburn, IN 46797
Mailing Address: P.O. Box 277, Woodburn, IN 46797-0277
Part 70 Permit No.: T003-5974-00008

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Uniroyal Goodrich Tire Manufacturing
Source Address: 18906 U.S. Highway 24 East, Woodburn, IN 46797
Mailing Address: P.O. Box 277, Woodburn, IN 46797-0277
Part 70 Permit No.: T003-5974-00008

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

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

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Uniroyal Goodrich Tire Manufacturing
Source Address: 18906 U.S. Highway 24 East, Woodburn, IN 46797
Mailing Address: P.O. Box 277, Woodburn, IN 46797-0277
Part 70 Permit No.: T003-5974-00008
Facility: Tread end cementing process
Parameter: Number of Tires
Limit: 2081 tires per hour
Limit: 10 g VOC/tire

YEAR: _____

Month	Gram VOC/tire	(no. of tires/hour)

9 No deviation occurred in this quarter.

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Uniroyal Goodrich Tire Manufacturing
Source Address: 18906 U.S. Highway 24 East, Woodburn, IN 46797
Mailing Address: P.O. Box 277, Woodburn, IN 46797-0277
Part 70 Permit No.: T003-5974-00008

Months: _____ to _____ Year: _____

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Uniroyal Goodrich Tire Manufacturing
Source Location:	US Highway 24 East, Woodburn, IN 46797
County:	Allen
SIC Code:	3011
Operation Permit No.:	T003-5974-00008
Permit Reviewer:	Holly M. Stockrahm

On February 6, 2000, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Uniroyal Goodrich Tire Manufacturing had applied for a Part 70 Operating Permit to operate an automobile and light duty truck assembly plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 13, 2000, Uniroyal Goodrich Tire Manufacturing submitted comments on the proposed Part 70 permit. Changes to conditions are noted by strikeout for deletions and redlining for additions. The summary of the comments is as follows:

Comment 1:
Under A.2a, remove 200, 208 210, 231, and 278 - these are for the mixing area. Also remove 285 (insignificant) since this is not a controlling device, but as we discussed a vacuum breaking unit for the unloading system.

Comment 2:
Under A.2b, add stack 231 - this is the dust collector for the pellet dump belt.

Comment 3:
Under A.2e, add units 168, 171, 176, 178, 186, 319, 323, and 329 - these are uncontrolled exhaust units.

Comment 4:
Under A.2h, remove the Quality assurance processes (insignificant) - these are not production processes. They are quality repair processes that require minor tire buffing to a few tires that are damaged during production. Less than 5 lbs per hour and 25 lbs per day of PM is generated. Remove stacks 33 and 37 that correspond to the Quality assurance processes.

Response to Comment 1, Comment 2,Comment 3, and Comment 4:
IDEM, OAM, agrees. Condition A.2 has been changed as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) carbon black unloading area, with a maximum capacity of 7621 pounds per hour, using a baghouse as control, exhausting at stacks ~~285 and~~ 356 A - D~~, 200, 208, 210, 231, and 278~~;

(b) One (1) Banbury mixing area, with a maximum capacity of 27,146 pounds of rubber, carbon black, and chemicals per hour, using a baghouse as control, exhausting at stacks 200, 208, 210, **231** and 278;

(c) Five (5) natural gas or No. 2/No. 6 fuel oil or fuel oil blend fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257;

(d) One (1) natural gas scrap incinerator, with a maximum capacity of 3.0 MM Btu/hr and 2,400 pounds of scrap per hour, using no control, exhausting at stacks 281, 282;

(e) One (1) component preparation area, which includes milling, extruding, and calendering with a maximum capacity of 35,400 pounds per hour, using no control, exhausting at stacks **168, 171**, 173, 174, **176**, **178**, **186**, 187, 254, 255, 311, 315, 318, **319**, 320, 322, **323,** 324, 325, 326, 327, 328, **329**, 330, and 355;

(f) One (1) tire building area, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 301-309, 312, and 313;

(g) One (1) tire curing process, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 51-58, 60-66, 68, 69, 71, 73, 75, 77, 79, 80, and 82-88;

(h) One (1) WSW grinding and TUO Module Area~~ and Quality assurance processes~~, with a maximum capacity of 28,378 pounds per hour, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277~~, and 33 and 37~~,

(i) One (1) tread end cementing process consisting of lines #1 and #2, with a production capacity of 2,081 tires per hour, using particulate baffle filters, exhausting at stacks 158, and 159;

(j) Miscellaneous solvent usage.

Comment 5:
I would like to request the requirement of a “risk management plan” be removed from the permit. This appears to be covered adequately in other required reporting. In addition, the plant is covered by a “general duty to run a safe plant.”

Response to Comment 5:
Upon further discussion with the Permittee, that Condition C.14 states that, "***If*** a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit...", therefore, no risk management plan (RMP) is required if there is no regulated substance or no substances above the threshold quantity. It is noted here that the source has specified at this time that they do not have any of these substances above the threshold quantity, so, therefore, no RMP is required at the time of initial permit issuance. However, the plan must be submitted if the Permittee meets or exceeds a threshold quantity for a regulated substance subject to 40 CFR 68. There will be no change to the permit as a result of this comment.

Comment 6:
Under D.1a, remove stack 285 as noted in A.2a above.

Response to Comment 6:
IDEM, OAM, agrees. The descriptions shall appear as noted in Response to Comments 1 through 4.

Comment 7:
Under the description D.1(c), remove Quality assurance processes as noted in A.2h above.

Response to Comment 7:
IDEM, OAM, agrees. The descriptions shall appear as noted in Response to Comments 1 through 4.

Comment 8:
Under D.1.1c, remove quality assurance processes as noted in A.2h above.

Response to Comment 8:
IDEM, OAM, agrees. Condition D.1.1. (c) shall be revised as follows:

(3) WSW grinding and TUO Module Area ~~and Quality assurance processes~~ shall not exceed 24 pounds per hour when operating at a process weight rate of 28,378 pounds per hour.

Comment 9:
Under D.1.4, remove quality assurance processes as noted in A.2h above.

Response to Comment 9:
IDEM, OAM, agrees. Condition D.1.4 shall be revised as follows:

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), the dust collectors, baghouses, cyclones, and dry filters for PM control shall be in operation at all times when the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area ~~and Quality assurance processes~~ are in operation.

Comment 10:
Under D.1.5 a 1, remove stack 285 as noted in A.2a above.

Response to Comment 10:
IDEM, OAM, agrees. Condition D.1.5 (a)(1) shall be revised as follows:

(1) Daily visible emissions notations of the carbon black unloading stack exhausts, ~~285,~~ 356A, 356B, 356C, 356D, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Comment 11:
Under D.1.5b(3), in the second sentence - "woodworking" should be changed to "mixing."

Response to Comment 11:
IDEM, OAM, agrees. Condition D.1.5(b)(3) shall be revised as follows:

(3) An inspection shall be performed each calender quarter of all bags controlling the ~~woodworking~~ **mixing** operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced

Comment 12:
Under D.1.5c(2), leaks in the duct work and cyclone would be internal to the plant and not to the environment. For that reason, I would ask that this weekly inspection be removed from the permit. Also any leakage from a crack in the duct would be insignificant.

Response to Comment 12:

IDEM, OAM, agrees. The permit condition D.1.5(c)(2) has been changed as follows:

(c) The WSW grinding and TUO Module Area have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the WSW grinding and TUO Module Area and Quality assurance processes stack exhausts, 258-261, and 265-277, and 33 and 37, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) ~~Weekly inspections for leaks in the ductwork or the cyclone shall be performed. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when visible emissions are present.~~

~~(3)~~ Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 13:
Under D.1.5c(3), this paragraph should be removed since the units do not have bags. These are mechanical cyclone separators.

Response to Comment 13:
IDEM, OAM agrees. Condition D.1.5(c)(3) has been deleted and the remaining section renumbered accordingly.

~~(3) In the event that bag failure has been observed:
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~(4)~~**(3)** Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 14:
Under D.1.6a, remove quality assurance processes as noted in A.2h above.

Response to Comment 14:
IDEM, OAM agrees. Condition D.1.6(a) has been changed as follows:

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.5, the Permittee shall maintain records of daily visible emission notations of the carbon black unloading, Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing, WSW grinding and TUO Module Area ~~and Quality assurance processes~~ stack exhausts.

Comment 15:
Under D.1.6.b (4-8), these items appear not to apply or seem redundant to compliance monitoring and the preventive maintenance plan. From the training standpoint, the plant only employs skilled union craftsmen that have gone through rigorous apprentice programs. Either these craftsmen or contractors that specialize in these systems will be used for the inspections and trip checks. Could this section be reworded to reflect the above.

Response to Comment 15:
IDEM, OAM understands that the source employs only trained employees or contractors. However, in order to document that monitoring is being performed properly and consistently, OAM is requiring that (4) through (8) remain in the permit. There will be no change to the permit as a result of this comment.

Comment 16:
Under D.2, need the latitude to burn #2 and #6 fuel oil. With this in mind the overriding regulation is the sulfur content of the oil and PM emissions.

Response to Comment 16:
IDEM, OAM agrees. The company may burn #2 or #6 or natural gas as long as SO_2 and PM limits are not exceeded. The description shall be changed and Condition D.1.1 modified as follows:

Five (5) natural gas /No. 6**/No. 2** fuel oil blend fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257.

D.2.1 Sulfur Dioxide (SO_2) Emissions Limitations [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the five (5) natural gas or No. 6/No. 2 fuel oil fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257 shall each not exceed**:**

(a) one and six tenths (1.6) pounds per MMBtu heat input when combusting No. 6 fuel oil, **or**

(b) five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil.

Comment 17:
Under D.2.4a, we need some clarification as to what has to be tested for on the #5 boiler stack. These test are relatively expensive ($8000 - $10,000) and would like to keep to a minimum. If sulfur is the primary concern this has been addressed in supplier oil certification of oil sulfur content. Per D.2.5 the plant must burn oil with a sulfur content of less than 1.5% by weight. I would like to request that D.2.5 override the need of a stack test for sulfur.

Comment 18:
Under D.2.4b, at this time #4 boiler is inoperative. Both the burner and the stack have been removed. I do not see it becoming operative in the near future. Number 5 boiler is in the process of being rebuilt. The remaining work requires additional skin sealing and tuning to 100% capacity.

I would like to suggest that stack testing on #5 boiler be removed from the permit for the following reasons:
(a) New “state of the art” controls were installed on #5 boiler in 1998.
(b) This is a natural gas/oil fired boiler not capable of burning coal.
(c) It is in the plant’s best interest to run this boiler at its maximum efficiency, which minimizes PM emission.
(d) 6 to 7 months out of the year the boiler is only run on natural gas which has a low emission factor for PM.
(e) When the new controls were installed in 1998 the boiler was equipped with an oxygen analyzer that monitors the stack assuring an O^2 greater than 2% and prevents smoking conditions.
(f) The maximum potential PM/MMBtu is less than half the allowable.
Again if the oil is being certified why can’t we use AP42 to verify emissions since this is the standard for the industry.

Response to Comments 17 and 18:
IDEM, OAM agrees that Boiler #5 can demonstrate ongoing compliance with SO_2 emissions through record keeping and reporting of the sulfur content of the fuel and the usage of the fuel after demonstrating initial compliance after the fuel change and rebuild of the unit.

Condition D.2.4(a) and (c) will be modified to include the reference to the rebuilding.

Additionally, per IDEM OAM Guidance on Stack Test Frequency for Title V Permit, the source is required to perform an initial test for opacity and NOx for oil-fired boilers, and NOx for natural gas-fired boilers with capacities greater than 100 MM Btu. However, because the permit contains no NOx limits, the source shall not be required to perform stack testing for NOx. The source is required to perform opacity testing when burning #6 fuel after the rebuild on Boiler #5. However, If Boiler #5 in its initial stack test demonstrates actual emissions of opacity to be less than 50% of the allowable limit for that pollutant, the Permittee may petition for skipping one test cycle. The source should then submit a request to IDEM no later than 360 days prior to the due date of the testing requesting an exemption from the current permit cycle test. The source has stated that they burn oil 5 to 6 months of the year, and burn natural gas 6 to 7 months of the year. The initial test shall be performed within 60 days of the completed rebuild of Boiler #5.

The requirements for the initial testing of Boiler #4 shall be changed as well, so that if that boiler is rebuilt, opacity testing shall be required. Therefore, Condition D.2.4 shall be changed as follows:

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) Within sixty days of ~~issuance of this permit, compliance with the SO_2 limitation in Condition D.2.1 and the PM limitation in Condition D.2.2 (b)~~ **the completed rebuild of Boiler #5, stack testing for opacity when burning No. 6 fuel oil shall be performed**. **Compliance** shall be determined by a performance stack test conducted in accordance with Section C - Performance Testing. The Permittee shall perform ~~PM~~ **opacity** testing utilizing Method 8 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The ~~PM~~ **opacity** testing shall be repeated at least once every two and one half (2 1/2) years from the date of this valid compliance demonstration.

(b) Within thirty days of the completed rebuild of Boiler #4, compliance with the ~~SO2~~ **opacity** limitation in Condition ~~D.2.1~~ **C.2** ~~and the PM limitation in Condition D.2.2 (a)~~ shall be determined by a performance stack test conducted in accordance with Section C - Performance Testing. The Permittee shall perform ~~PM~~ **opacity** testing utilizing Method 8 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The ~~PM~~ **opacity** testing shall be repeated at least once every two and one half (2 1/2) years from the date of this valid compliance demonstration.

~~(c) The Permittee is not required to routinely test these facilities for SO_2 after the initial testing. The initial testing is required to prove compliance after a fuel change (from No. 6 fuel oil or natural gas, to a No. 6 fuel oil and natural gas blend). However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Comment 19:
Under description D.4a, change from “no controls”, to “using particulate baffles.”

Response to Comment 19:
IDEM, OAM agrees. Description D.4(a) has been changed as follows and a Compliance Determination Condition D.4.6 has been added requiring that the particulate baffles be in place to comply with D.4.3 Particulate Matter Limitation (PM) [326 IAC 6-3-2]. Section D.4 shall be renumbered accordingly.

(a) One (1) tread end cementing process, with a maximum capacity of 2,081 tires per hour, using ~~no control~~ **particulate baffles**, exhausting at stacks 157, 158, and 159.

D.4.6 Particulate Matter

Pursuant to 326 IAC 6-3-2(c), the particulate for PM control shall be in operation at all times when the tread end cementing or the green tire spraying is in operation.

Comment 20:
Under description D.4b, change from “no controls”, to “using particulate baffles.”

Response to Comment 20:
IDEM, OAM agrees. A Compliance Determination Condition D.4.6 has been added requiring that the particulate baffles be in place to comply with D.4.3 Particulate Matter Limitation (PM) [326 IAC 6-3-2]. See Response to Comment 19. Description D.4(a) has been changed as follows

(b) One (1) green tire spray, with a maximum capacity of 35,400 pound per hour, using ~~no control~~ **particulate baffles**, exhausting at stacks 130, 132, 145, 262, 263, 264, 279, and 280.

Comment 21:
Under D.4.3, this should be clarified to Cementer only.

Response to Comment 21:
IDEM, OAM disagrees. The cementer should be included, but the green tire spraying process should be included as well. D.4.3 has been changed as follows:

D.4.3 Particulate Matter Limitation (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the green tire spraying **and the tread end cementer** shall be limited by the following:
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Comment 22:
Under D.4.5a, (1) through (6) should be (1) through (5).

Response to Comment 22:
IDEM, OAM agrees. Condition D.4.5(a) has been changed as follows:

D.4.5 Record Keeping Requirements

(a) To document compliance with Conditions D.4.2 (a), the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2 and D.4.3.

Comment 23:
Under D.4.5b, Record keeping - "maintain records of green tire spray formulation" change to "MSDS record must be maintained on site."

Response to Comment 23:
IDEM, OAM agrees. Condition D.4.5 (b) has been changed as follows:

(b) To document compliance with D.4.5 (b), the Permittee shall maintain ~~records of green tire spray formulation data~~ **an MSDS record** or the results of Method 24 analysis conducted to verify the VOC content of the spray **on site**.

Comment 24:
Under D.4.6a, previously agreed this report would be semi-annual.

Response to Comment 24:
IDEM, OAM agrees. Semi-annual reporting is adequate to fulfill the requirements of D.4.1. This section has been renumbered. Condition D.4.8(a) has been changed as follows:

D.4.8 Reporting Requirements

(a) A ~~quarterly~~ **semi-annual** summary of the information to document compliance with Condition D.4.1 concerning tread end cementing shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the ~~quarter~~ **six months** being reported.

Comment 25:
Under D.4.6b Condition D.4.5(b), should this be D.4.5(a).
Usage of cleanup solvents can be extracted from purchasing and accounting records when required. This is reported annually as part of the annual air emissions inventory. Is that sufficient for the annual report? Tread end cement would continue to be reported semi-annually.

Response to Comment 25:

There is no VOC monthly limit which includes cleanup solvents, therefore, IDEM, OAM, agrees that the requirement to keep records of the cleanup solvent usage each month can be changed to each year and submitted in the annual emissions inventory information. Condition D.4.7 shall be changed as follows:

D.4.7 Record Keeping Requirements

(a) To document compliance with Conditions D.4.2 (a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2 and D.4.3.

(1) The amount of VOC content of the cement used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each ~~month~~ **year**;

(3) The total VOC usage for each month; and

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

Comment 26:
Under D.5a, add units 168, 171, 176, 178, 186, 319, 323, and 329 - these are uncontrolled exhaust units.

Response to Comment 26:
IDEM, OAM agrees. Description D.5 (a) has been changed as follows:

(a) One (1) component preparation area, which includes milling, extruding, and calendering with a maximum capacity of 35,400 pounds per hour, using no control, exhausting at stacks **168, 171,** 173, 174. **176, 178, 186,** 254, 255, 318, **319,** 322, **323,** 325, 326, 327, **329,** 330, 355, 311, 315, 320, 324, and 328;

Comment 27:
Under TSD page 1a, remove stack #285.

Response to Comment 27:
This TSD Addendum is part of the TSD. It serves to address the changes made in the permit as a result of comments from industry, the compliance inspector, EPA, and/or OAM. The TSD will not be revised except through the addition of the information to the Addendum. OAM is noting the requested change here.

Comment 28:
Under TSD page 1e, add units 168, 171, 176, 178, 186, 319, 323, and 329 - these are uncontrolled exhaust units.

Response to Comment 28:
Please see the Response to Comment 27.

Comment 29:
Under TSD page 1h, remove quality assurance process.

Response to Comment 29:
Please see the Response to Comment 27.

Comment 30:
Under TSD page 6e, second sentence reads “sampling sampling”

Response to Comment 30:
Please see the Response to Comment 27.

Comment 31:
Under TSD page 7, fourth paragraph - remove Quality Assurance Processes.

Response to Comment 31:
Please see the Response to Comment 27.

Comment 32:
Under TSD page 11, 326 IAC 6-3-2 (Process Operations) - remove Quality Assurance Processes. It is in the paragraph twice.

Response to Comment 32:
Please see the Response to Comment 27.

Comment 33:
Under TSD page 13 1a, remove stack 285.

Response to Comment 33:
Please see the Response to Comment 27.

Comment 34:
Under TSD page 15 3a, remove Quality Assurance Process and stacks 33 & 37.

Response to Comment 34:
Please see the Response to Comment 27.

Comment 35:
Under TSD page 15 3b, leaks in the duct work and cyclone would be internal to the plant and not to the environment. For that reason I would ask that this weekly inspection be removed from the permit. Also any leakage from a crack in the duct would be insignificant.

Response to Comment 35:
IDEM, OAM agrees. Please see the Response to Comment 27 and Response to Comment 5.

Comment 36:
Under TSD page 15 3c, this paragraph should be removed since the units do not have bags. These are mechanical cyclone separators.

Response to Comment 36:
Please see the Response to Comment 27 and Response to Comment 13.

Comment 37:
In general, please consider the following issues:

As noted in the TV draft the following is being requested:
An annual compliance certification.
A semi-annual compliance monitoring report.
A compliance monitoring plan on each permitted process.
A compliance response plan on each permitted process.
A preventive maintenance plan on each permitted process.
A written emergency reduction plan.
An annual emission statement.
Boiler stack testing.
Out of compliance reporting (process upsets).
Monthly trip checks of fail safe pressure switches.
Quarterly bag checks.
Weekly ductwork inspections.
Daily visible stack emission notations.

Semi-annual tread cement reports.
A risk management plan.
An annual miscellaneous solvent usage report.
Quality Assurance procedures.
Operator operating procedures.
Equipment troubleshooting contingency plan.
Fuel oil certification.

Please review the above for redundancy and/or necessity. For instance could the annual emissions report substantiate compliance, or daily visible emissions notations override the need for trip or bag checks, etc. Would like relief on the above and also as noted below. The inspections and frequencies seem to be overkill for what is being accomplished.

Response to Comment 37:

These inspections and reports each cover a different aspect of compliance and the frequencies are based on the potential for non-compliance. The weekly ductwork inspection has been deleted as discussed in Response to Comment 5. No other change has been made to the permit as a result of this comment.

Comment 38:

On the quarterly inspection of bags in the dust collectors:

Normal life of a dust collector bag is 3 to 5 years depending on the severity of the application. The chemicals and carbon black that enter the plant's dust collectors are considered relatively mild particulates compared to what you would find in an other industries such as foundries. The problem we have with our bags is not tearing but compacting due to the fineness and sticky nature of the materials. Over time, normally two years, the bags become so compacted that they must be replaced. It should be mentioned that as the bags compact they ventilate the process less efficiently and will exhaust less to the atmosphere.

The plant has two shutdown periods per year. The current schedule is that every other year we use these shutdowns to inspect and replace the compacted bags. If you would review the IDEM inspections (I can send you copies) over the past several years, I think you will find that the subject dust collectors have never been found to be in violation from dust emissions. I would like to suggest that these inspections be changed to a least annually.

Response to Comment 38:

Given that (1) the problem with the bags is not tearing but compacting due to the fineness and sticky nature of the materials, and that (2) there is no history of dust emission violations and (3) under normal operation, the bags become so compacted that they must be replaced every 2 years, it would be acceptable to inspect the bags two times per year, during the plant shutdown periods. The condition D.1.5 Monitoring (a)(3) and (b)(3) shall be modified as follows:

(3) An inspection shall be performed ~~each calender quarter~~ **semi-annually** of all bags controlling the carbon black unloading operation when venting to the atmosphere. A baghouse inspection shall be performed within ~~three~~ **six** months of redirecting vents to the atmosphere and every ~~three~~ **six** months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Comment 39:

Trip checks of fail safe switches:

Trip checks on even the plant's most sensitive equipment are performed only once per year. Please review the frequency of the checks and extend them to a more reasonable frequency based on industry standards and histories.

Response to Comment 39:

The permittee previously requested that the installation of fail safe pressure switches substitute for the requirement of the daily pressure readings on the baghouses. The purpose of both monitoring requirements is to assure continuous compliance with the particulate limitations on the equipment. Extending the frequency of the checks to greater than monthly would not be an acceptable frequency to demonstrate continuous compliance. Regardless of what was the past performance check frequency, IDEM believes that a monthly check is a reasonable frequency to assure continuous compliance. The permittee under Condition D.1.5 (a)(2) and (b)(2) is required to keep records of the results of these inspections as well as documentation of any other times that the switches were tripped and what corrective action was taken.

Comment 40:

Pressure differential ranges:

The current plan is to rebag and refurbish the subject baghouses this year. Much of this work should be done during our July shutdown. As noted in the draft I would like to establish pressure ranges after this work is complete. The ranges mentioned in the draft are strictly theoretical manufacturer provided and more than likely do not reflect the true ranges for the bags and material being handled. I would like to confirm that the wording in the draft is allowing for this.

At this time it is planned to tie these differential readings into a PLC with recording capability and monitoring. This will give us the capability of collecting data to establish the above mentioned true ranges. Once the real ranges have been established the PLC will be programmed to shut the units down if there is an upset.

Response to Comment 40:

The language in Condition D.1.5 Monitoring specifies specific pressure ranges or "a range established during the latest compliant stack test." This language is adequate to allow the operation of the baghouse according to manufacturer's specifications until a more appropriate range is determined by a stack test. The appropriate range will be that which was determined by the most recent compliant stack test.

Comment 41:

Per our phone conversation the week of February 27th, the following is for informational purposes only:

(1) Our #3 mixer dust collector (stack #200) is being replaced this year with a new collector.
(2) A project is being initiated to exhaust the fumes from the plant's #4 3-roll calendering process. This will have no control devices and is to be used for removing the fumes only. Per our conversation this exhauster will not require permitting.

Response to Comment 41:

IDEM has determined that no modification of the permit is required.

Comment 42:
Concerning open burning, the primary responder to any fire at the plant is it's own volunteer fire brigade. As part of their training they openly burn outside the plant and then extinguish the fire for practice. This is done less than once every couple months and last about one hour. The burnables are wood or wood products. I would like to request this as an insignificant activity. (reference C.3)

Response to Comment 42:

Under Condition C.3 Open Burning of the Title V permit, it states that the Permittee shall not 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. Burning of wood products for the purpose of fire training is not an exempt activity, and the Permittee should seek authorization for the issuance of an approval by submitting an application. The application can be found on the internet at www.state.in.us/idem/OAM/comply/burn.html, or you may contact Marilyn Kidwell at (317) 233-5672, to have an application faxed or mailed to you. There is no change to the permit as a result of this comment.

Comment 43:

Concerning carbon black unloading, the carbon black system (stacks 356 A - D) consists of a silo with four compartments. This system is similar to grain or oil unloading and storage. As the compartments are filled from rail cars the air must be vented to the atmosphere. This is done through the four non-motorized (no fan) 99.9% efficient filters (not control devices) at the top of each compartment. These vents are an inherent part of the storage process. It should also be noted that this is not a continuous operation but intermittent should they be regulated the same as a dust collector exhausting a continuous production operation. Can this be declared insignificant?

Response to Comment 43:

These vents are not dust collectors, but are inherent parts of the tanks. Therefore, it would be inappropriate to regulate the filters as control devices. However, because they are part of the tank and, therefore, expected to be in place and functioning properly as specified by the manufacturer. There is no change to the permit as a result of this comment.

Upon further review, IDEM, OAM has made the following changes:

1. D.2.3 contains a spelling error.

(d) The Permittee shall take daily samples of the blended fuel oil in the large storage tank and analyze the samples for sulfur content. Fuel oil from the large storage ~~tand~~ **tank** shall not be used until five consecutive daily samples show a sulfur content of 1.528% or less. Uniroyal shall not begin using the fuel oil if blending has not continued for ten days since the last of the additional fuel oil was added to the large storage tank, even if five (5) consecutive daily samples show compliance with the sulfur content requirement.

2. D.2.7 (b) should refer to D.2.6 instead of D.2.5.

(b) To document compliance with Condition ~~D.2.5~~ **D.2.6**, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.

3. D.4.7(a) should refer to D.4.2. In addition, D.4.7(a)(3) and D.4.7(b) contain spelling errors.

D.4.7 Compliance Provisions NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart BBB]

(a) To determine compliance with Condition ~~D.4.1 (a)~~ **D.4.2**, the Permittee shall:

(1) Determine the density and weight fraction VOC as specified under §60.543(c)(1).

(2) Calculate the total mass of VOC used at the affected facility for the month (M_0) as specified under §60.543(c)(2).

(3) Determine the total number of ~~tires~~ **tires** cemented at the affected facility for the month (T_0) by the following procedure:

(A) For a tread end cementing operation, T_0 equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.

(4) Calculate the mass of VOC used per tire cemented at the affected facility for the month (G):
$G = M_0 / T_0$

(5) Calculate the mass of VOC emitted per tire cemented at the affected facility for the month (N):
$N = G$

(b) To determine compliance with Condition D.4.1 (b), the Permittee shall submit formulation data or the results of Method 24 analysis to verify the VOC content of each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported ~~withing~~ **within** 30 days as required under §60.546(j).

4. As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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 ~~based on~~ continuous or intermittent ~~data~~;

(4) The methods used for determining compliance 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, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Uniroyal Goodrich Tire Manufacturing
Source Location:	18906 U.S. Highway 24 East
County:	Allen
SIC Code:	3011
Operation Permit No.:	T003-5974-00008
Permit Reviewer:	Holly M. Stockrahm

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Uniroyal Goodrich Tire Manufacturing relating to the operation of a rubber tire manufacturer.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) carbon black unloading area, with a maximum capacity of 7621 pounds per hour, using a baghouse as control, exhausting at stacks 285 and 356 A - D;

(b) One (1) Banbury mixing area, with a maximum capacity of 27,146 pounds of rubber, carbon black, and chemicals per hour, using a baghouse as control, exhausting at stacks 200, 208, 210, 231,and 278;

(c) Five (5) natural gas or No. 2/No. 6 fuel oil or fuel oil blend fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257;

(d) One (1) natural gas scrap incinerator, with a maximum capacity of 3.0 MM Btu/hr and 2,400 pounds of scrap per hour, using no control, exhausting at stacks 281, 282;

(e) One (1) component preparation area, which includes milling, extruding, and calendering with a maximum capacity of 35,400 pounds per hour, using no control, exhausting at stacks 254, 255, 318, 322, 325, 326, 327, 330, 355, 311, 315, 320, 324, 328, 173, and 174;

(f) One (1) tire building area, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 301-309, 312, and 313;

(g) One (1) tire curing process, with a maximum capacity of 35,400 pound per hour, using no control, exhausting at stacks 51-58, 60-66, 68, 69, 71, 73, 75, 77, 79, 80, and 82-88;

(h) One (1) WSW grinding and TUO Module Area and Quality assurance processes, with a maximum capacity of 28,378 pounds per hour, using centrifugal separators as control, exhausting at stacks 258-261, and 265-277;

(i) One (1) tread end cementing process consisting of lines #1 and #2, with a production capacity of 2,081 tires per hour, using particulate baffle filters, exhausting at stacks 158, and 159;

(j) Miscellaneous solvent usage.

Unpermitted Emission Units and Pollution Control Equipment

The source made the following tread end cement process change without notification to the Office of Air Management:

(a) The removal of tread end cementer #3, and

(b) The transfer of that production to tread end cementer #2.

Although the removal of the tread end cementer #3 did not require notification, the increase in VOC throughput and, therefore, the increase in potential emissions of the previously registered #2 tread end cementer did require a permit pursuant to 326 IAC 2-1 and 326 IAC 2-2. It is noted here that the overall actual emissions from the tread end cement process did not increase. The increased production on #2 did not affect Article 8 applicability for that line.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes no new emission units or pollution control equipment.

Insignificant Activities

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

(a) Space heaters, process heaters, or boilers using the following fuels:
- Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) The following VOC and HAP storage containers
- Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(i) Cleaners and solvents characterized as follows:

Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or

Having a vapor pressure equal to or less than 0.7 kPA; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Noncontact cooling tower systems with either of the following:

Forced and induced draft cooling tower system not regulated under a NESHAP.

(n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(o) Heat exchanger cleaning and repair.

(p) Paved and unpaved roads and parking lots with public access.

(q) Asbestos abatement projects regulated by 326 IAC 14-10.

(r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(t) On-site fire and emergency response training approved by the department.

(u) Emergency generators as follows:

Gasoline generators not exceeding 110 horsepower.

(v) Other emergency equipment as follows:

Stationary fire pumps.

(w) A laboratory as defined in 326 IAC 2-7(21)(D).

(x) Farm operations.

(y) Other activities or categories not previously identified:

Volatile Organic Liquid Tank Storage:

Tank ID	Product	Capacity
413-T1	naptha petrol.	15,500
413-T2	paraffin oil	16,400
413-T3	stearic acid	16,400
413-T4	phenyl	16,400
413-T5	paraffin oil	22,700
413-T6	aromatic oil	22,700
413-T7	aromatic oil	22,700
413-T8	#6 fuel oil	90,000
413-T9	#6 fuel oil	2,000,000

(z) One (1) green tire spray, with a maximum capacity of 35,400 pound per hour, using particulate baffle filters, exhausting at stacks 130, 132, 145, 262, 263, 264, 279, and 280;

Existing Approvals

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

(a) Administrative Amendment A003-9222-00008, issued on January 29, 1998;

(b) Registration R003-5711-00008, issued on June 21, 1996;

(c) Exemption E003-5710-00008, issued on June 21, 1996;

(d) Administrative Amendment A003-5780-00008, issued on August 1, 1996;

(e) Registration CP 003-2544 (for relocated opelika painter), issued on June 1, 1992;

(f) Registration CP 003-2077 (for north tire room radial painter), issued on June 18, 1992;

(g) Registration CP 003-00008 (for #1 tread cementer), issued on May 30, 1991;

(h) Construction Permit CP (02) 1819, issued on January 25, 1990;

(i) Construction Permit CP (02) 1878, issued on January 25, 1990;

(j) Registration CP 003-2138 (for #2 tread cementer), issued on September 13, 1991;

(k) Operation Permit OP 02-08-93-0716, issued on May 31, 1990;

(l) Construction Permit PC (02) 1769, issued on July, 5, 1989;

(m) Exemption (for #8, 9, and 11 TUO modules), issued on November 3, 1986;

(n) Registration (for # 14 - #20 TUO modules), issued on July 18, 1985;

(o) Registration (for two south radial painters), issued on August 3, 1984;

(p) Registration (for #13 TUO module), issued on June 24, 1983;

(q) Operation Permit OP 02-03-86-0585, issued on June 30, 1982;

(r) Operation Permit OP 02-03-86-0586, issued on June 30, 1982;

(s) Operation Permit OP 02-03-86-0587, issued on June 30, 1982;

(t) Operation Permit OP 0060-0008-0720;

(u) Operation Permit OP 02-03-86-0588, issued on June 30, 1982;

(v) Registration (for the incinerator), issued on September 5, 1980;

(w) Registration (for one south radial painter), issued on June 3, 1980;

(x) Registration (for #10, #12, #21, and #22 TUO modules), issued on June 3, 1980;

All conditions from previous approvals were incorporated into this Part 70 permit except for:

(a) the following from Operation Permit 02-08-93-0716, issued on May 31, 1990:

4. That tread end cementer No. 157 shall comply with NSPS (New Source Performance Standard) 40 CFR 60.540 to 60.548, Subpart BBB (copy enclosed). This subpart limits emissions to 10 grams of volatile organic compounds per tire, and requires performance tests, compliance provisions, and reporting.

5. That tread end cementer No. 157 shall comply with a site specific RACT (Reasonably Available Control Technology) pursuant to 326 IAC 8-1-5. RACT for this facility has been determined to be same requirements as in Condition 4.

6. That the existing tread end cementer No. 157 shall be taken out of service before the new cementer is put into operation.

7. That the volatile organic compounds delivered to the cementer shall be limited to 3.80 tons per month (45.6 tons per year).

Note: The limit in condition 7 is the Potential Definition for this facility. This was included as a limit because the limit in Condition 4, when expanded to maximum capacity and 8760 hours per year could allow the facility to exceed the significant level for Prevention of Significant Deterioration (PSD) requirements. As a result of Conditions 6 and 7, state and federal rules for the Prevention of Significant Deterioration will not apply. Since this limit is only to the potential, not below it, this is not a synthetic minor permit.

Reason not incorporated:
The tread end cementer No. 157 was replaced with #3 and the same limits and conditions established for No. 157 were to apply to cementer #3. Then the source removed tread cementer #3. Therefore, Conditions 4 through 7 are for cementers that no longer exist and should be removed.

Enforcement Issue

(a) IDEM is aware that a process has been modified and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is aware that the boilers #1 through #5, since construction, have been using No. 6 fuel oil with a weight percent sulfur content of 1.64 %. This would cause the pounds of SO_2 per MM BTU to exceed the allowable level of 1.6 pounds of SO_2 per MM BTU pursuant to 326 IAC 7-1.1. Upon discovery during the Title V permit review, the source immediately switched to natural gas fuel and have requested that the permit be modified to state that the fuel oil to be used in the future shall not exceed 1.528 % sulfur content. This sulfur content equates to 1.6 lb SO2 per MM Btu as required by the rule.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operation permit rules. The following Condition has been incorporated into the TV permit.

D.2.3 Compliance Schedule for Combustion of Boiler Fuel Oil with Excess Sulfur Content

Final resolutions regarding violations from combustion of the Boiler Fuel Oil with excess sulfur content will be address through a later Agreed Order or Commissioner's Order, which will provide for appropriate civil penalties, the following interim steps should be taken regarding the Boiler Fuel Oil Currently at the Woodburn Plant:

(a) The Permittee shall utilize as fuel all present contents of the day tank, now containing approximately 75,000 gallons of fuel oil with a sulfur content of 1.64%. After the tank is emptied, Uniroyal shall not allow any fuel oil with a sulfur content exceeding 1.528% to be placed in the tank.

(b) The Permittee shall add 600,000 gallons of fuel oil with a sulfur content of 1.34% to the large storage tank, and use the tank heaters to provide thermal drafting to blend the oils. Data shall be submitted showing when this fuel oil was added, and that its sulfur content complies with these requirements, to Mr. Brian Eaton at the above address. This data shall be submitted prior to using the blended oil in the large storage tank as fuel.

(c) The Permittee shall continue blending the oils for at least ten (10) days after the last of the additional 600,000 gallons of fuel oil is added, before any fuel oil from the large storage tank is used as fuel.

(d) The Permittee shall take daily samples of the blended fuel oil in the large storage tank and analyze the samples for sulfur content. Fuel oil from the large storage tand shall not be used until five consecutive daily samples show a sulfur content of 1.528% or less. Uniroyal shall not begin using the fuel oil if blending has not continued for ten days since the last of the additional fuel oil was added to the large storage tank, even if five (5) consecutive daily samples show compliance with the sulfur content requirement.

(e) After sampling has demonstrated compliance with the requirements in paragraph (d), sampling sampling of the fuel oil shall be conducted weekly instead of daily, until this requirement is modified by a final order resolving IDEM's enforcement action regarding combustion of Boiler Fuel Oil with excess sulfur content.

(f) The Permittee shall maintain records of its fuel oil sampling and its analysis of the fuel oil sulfur content for at least two years from the date of sampling. A record shall be maintained of the sampling procedure used for taking fuel oil samples. These records shall be kept on-site and made available to IDEM upon request.

(g) After blending has continued for at least ten (10) days, and sampling has demonstrated compliance with the requirements in paragraph (d), the Permittee shall not allow any fuel oil with a sulfur content exceeding 1.528% to be placed in the large storage tank.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. A notice of completeness letter was mailed to the source on February 19, 1997.

Emission Calculations

Allowable PM emissions pursuant to 326 IAC 6-3-2, for carbon black unloading:
$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight
$E = 4.1\ (3.8105)^{0.67}$ rate in tons per hour
E = 10.05 lb/hr

Potential PM emissions after control:
0.38 lb/hr Unit complies with 326 IAC 6-3-2.

Allowable PM emissions pursuant to 326 IAC 6-3-2, for Banbury Mixing:
$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight
$E = 4.1\ (13.573)^{0.67}$ rate in tons per hour
E = 23.5 lb/hr

Potential PM 10 emissions after control:
0.543 lb/hr

Allowable PM emissions pursuant to 326 IAC 4-2, for scrap incineration:
Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour shall not emit particulate matter in excess of 0.3 pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

Manufacturer's guaranteed particulate emission rate is 0.15 lb of PM/1000 lb dry exhaust gas corrected to 50% excess air.

Allowable PM emissions pursuant to 326 IAC 6-3-2, for WSW grinding and TUO Module Area and Quality assurance processes:
$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight
$E = 4.1\ (14.189)^{0.67}$ rate in tons per hour
E = 24 lb/hr

Potential PM10 emissions after control = 0.98 lb/hr

Allowable PM emissions pursuant to 326 IAC 6-2-3 (PM Emissions Limitations for Sources of Indirect Heating) from the boilers, identified as #1 through #5, (based on construction dates of 1961, 1961, 1961, 1968, and 1974, respectively), shall be limited by the following:
$Pt = C \times a \times h/76.5 \times Q^{0.75} \times N^{0.25}$ where Pt = pounds of particulate matter emitted per MMBtu
C = Maximum ground level concentration = default value 50
Q = total source maximum operating capaciyt in MM Btu/hr
N = Number of stacks in fuel burning operation
a = plume rise value = default value 0.67
h = stack height in feet

For Boilers #1, #2, #3, and #4 (52 MM Btu/hr for #1, #2, and #3 each, and 105 MM Btu/hr for #4):
$Pt = 50 \times 0.67 \times 120/76.5 \times (261)^{0.75} \times (3)^{0.25}$
Pt =4020/76.5 x 65 x 1.32 = 4020/6563.7 = 0.61 lb/MM Btu
The calculated allowable of 0.61 is less than the default allowable of 0.8, therefore the calculated allowable is the limit.
Potential = 128 ton/yr*yr/8760 hr*2000 lb/ton = 29.22 lb PM/hr
29.22 lb PM/hr/ 261 MM Btu/hr = 0.11 lb PM/MM Btu, units are in compliance.

For Boiler #5 (130 MM Btu/hr): Pt = 50 x 0.67 x 120/76.5 x $(367)^{0.75}$ x $(4)^{0.25}$
Pt = 4020/76.5*84*1.4 = 4020/8996 = 0.45 lb PM/hr
The calculated allowable of 0.45 is less than the default allowable of 0.6, therefore the calculated allowable is the limit.
Potential = 105.9 ton/yr*yr/8760 hr*2000 lb/ton = 24.17 lb PM/hr
24.17 lb PM/hr/ 130 MM Btu/hr = 0.19 lb PM/MM Btu, unit is in compliance.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	greater than 250
VOC	greater than 100, less than 250
CO	less than 100
NO_x	greater than 100, less than 250

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

HAP's	Potential To Emit (tons/year)
maximum potential of single HAP*	greater than 10
TOTAL	greater than 25

*Please see Title V application forms GSD - 08 for comprehensive HAP information.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulater matter, particulate matter less than 10 microns, sulfur dioxide, volatile organic compounds, and nitrogen oxides are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 Title V application information from forms GSD -07 and GSD-08.

Pollutant	Actual Emissions (tons/year)
PM	44.8
PM-10	36.3
SO_2	333.7
VOC	132.5
CO	35.9
NO_x	119.5
xylene	13.98
1,3 butadiene	2.83
all other HAPs	4.69

Limited Potential to Emit

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

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
tread end cement process				80.4			
Total Emissions				80.4*			

*This limit equals the potential emissions from the tread end cement process.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) This tire manufacturer is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.540, Subpart BBB) for the rubber tire manufacturing industry.

(a) The requirements apply to each undertread cementing operation, each sidewall cementing operation, each tread end cementing operation, each bead cementing operation, each green tire spraying operation, each Michelin-A operation, each Michelin-B operation, and each Michelin-C automatic operation.

(a) Tread end cementers: Emissions are limited to 10 grams of volatile organic compounds per tire, require performance tests, compliance provisions, and reporting.

(b) The radial green tire painters: for each green tire spraying operation where only water based sprays are used: Emissions are limited to 1.2 grams of VOC per tire sprayed with a water-based inside green tire spray for each month; and 9.3 grams of VOC per tire sprayed with a water based outside green tire spray for each month.

(b) The five (5) boilers, #1 - #5, are not subject to 40 CFR 60 (Subpart D) because the boilers were constructed as follows, #1-#3 in 1961, #4 in 1968, and #5 in 1974, and construction predates the applicability date of the NSPS.

(c) 40 CFR 60,Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids, do not apply to either the storage tanks 413-T1 through 413-T7, because their capacities are less than 40,000 gallons, or to 413-T8 or 413-T9, because their date of construction preceded the applicability date of June 11, 1973.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source. The chlorinated solvent degreasers have been removed from the source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The volatile organic compounds delivered to the tread end cementing operation shall be limited to the production of 2,081 tires per hour which would result in 80.4 tons per 12 consecutive months. This limit is the potential definition for this facility.

Operation Permit 02-08-93-0716, issued on May 31, 1990, was for the replacement of the original tread end cementer #157 (which had potential emissions of 45.6 tons per year) by tread end cementer #3. This was not a modification but a like for like replacement, and, therefore, the limit was carried into Operation Permit 02-08-93-0716. That permit contained this comment: *The limit in Condition 7* (45.6 tons per year) *is the Potential Definition for this facility* (tread end cementer #3). *This limit was included as a limit because the limit in Condition 4 (*10 grams of volatile organic compounds per tire*), when expanded to maximum capacity and 8760 hours per year could allow the facility to exceed the significant level for Prevention of Significant Deterioration (PSD) requirements. As a result of Conditions 6 and 7, state and federal rules for the Prevention of Significant Deterioration will not apply. Since this limit is only to the potential, not below it, this is not a synthetic minor permit.*

Subsequently, the tread end cementer #3 was removed and its production was incorporated into the registered tread end cementer #2. There was no net increase in PTE. During the TV permit review process, the source asked that the existing tread end cementing lines #1 and #2 be allowed to split that production evenly. Again, there is no net increase in PTE. Therefore, the potential to emit of lines 1 and 2 and the no longer existing line 3 were combined to develop the new limit for the tread end cement process.

In order to calculate the new limit in tires per hour for the tread end cement process, the original permitted potential emissions limitations for #1, #2, and #3 were added together and then that sum was used to back calculate the number of tires that can be produced on the existing lines #1 and #2 at 4 grams of VOC per tire (based on cement density of 6.2 lb/gal, VOC weight percent of 89.74%, and an application rate of 0.0014 gallons per tire).

24.6 ton VOC/yr + 10.2 ton VOC/yr + 45.6 ton VOC/yr = 80.4 ton VOC/yr
80.4 ton/yr * 2000 lb/ton * yr/8760 hr * tire/ 4 gram VOC * 453.59 gram/ lb = 2081 tires/hr

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds, nitrogen oxides, and sulfur dioxide. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity emissions 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%) opacity 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.

State Rule Applicability - Individual Facilities

326 IAC 4-2-2 (Incinerator)

Pursuant to 326 IAC 4-2-2 (Incinerators), this natural gas incinerator, rated at 3 MM Btu/hr shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning wood products.

(c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

(d) Be maintained properly as specified by the manufacturer and approved by IDEM.

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.

(g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.

(h) Not create a nuisance or a fire hazard.

(i) Not emit particulate matter (PM) in excess of 0.3 pounds per 1000 pounds of dry exhaust gas corrected to 50% excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the carbon black unloading shall not exceed 10.05 pounds per hour, Banbury mixing shall not exceed 23.5 pounds per hour, WSW grinding and TUO Module Area and Quality assurance processes shall not exceed 24 pounds per hour, tire repair grinding and buffing shall not exceed 24 pounds per hour. Green tire spraying, shall be limited by the following:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dust collectors, baghouses, and dry filters, and cyclones shall be in operation at all times the carbon black unloading, Banbury mixing, WSW grinding and TUO Module Area and Quality assurance processes, and green tire spraying are in operation, in order to comply with this limit.

326 IAC 6-2-3 (PM Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3, the particulate matter (PM) from the boilers, identified as #1 through #5, shall be limited by the following:

$Pt = C \times a \times h/76.5 \times Q^{0.75} \times N^{0.25}$ where Pt = pounds of particulate matter emitted per MMBtu

(a) Each Boiler #1, #2, #3, or #4 shall not exceed 0.61 pounds of PM per MM Btu, and

(b) Boiler #5 shall not exceed 0.45 pounds of PM per MM Btu.

326 IAC 7-1(Sulfur Dioxide (SO_2))

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the five (5) natural gas or No. 6 fuel oil fired boilers, identified as #1 through #5, with maximum capacities of 52, 52, 52, 105, and 130 million British thermal units per hour (MM Btu/hr), respectively, using no control, exhausting at stacks 109, 114, 124, and 257 shall not exceed one and six tenths (1.6) pounds per MMBtu heat input.

The lb/MM Btu of the boilers is calculated as follows:

SO2 emission factor from AP42 for industrial boilers using No. 6 fuel is 157S lb SO2/kgal of fuel, where S is equal to the weight percent sulfur in the fuel. The source has stated that the highest sulfur content of the fuel is S = 1.64, so the emission factor for SO2 is 257.48 lb of SO2 per 1 kilogallon of fuel.

The total MM Btu per hour for all of the boilers is 391.

1 gallon of No. 6 fuel has a heating value of 150,000 Btu.

Fuel usage = 391 MM Btu/hr * .001 kgal/.15 MM Btu = 2.61 kgal/hr = 22834 kgal/yr based on 8760 hours in a year.

22834 kgal/8760 hours * 257.48 lb SO2/kgal = 5879298 lb SO2/8760 hours

(5879298 lb SO2/8760 hours) / (391 MM Btu/hr) = 1.72 lb of SO2 per MM Btu/hr. **Source is out of compliance and a schedule has been agreed upon to bring the source back into compliance. The compliance schedule appears in Section D.2 of the permit.**

326 IAC 8-1-5 (Site Specific Reasonably Available Control Technology (RACT))

The tread end cementing operation shall comply with a site specific RACT which has been determined to be compliance with the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.540, Subpart BBB) for the rubber tire manufacturing industry.

326 IAC 8-3-2 (Cold Cleaner Degreaser)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks are not subject to this because the vapor pressure of the materials stored are less than 1.52 psi.

326 IAC 8-5-4 (Pneumatic Tire Manufacturer)

The requirements of 326 IAC 8-5-4 do not apply to this source because it is located in Allen County and was not constructed between January 1, 1980 and January 20, 1983.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The carbon black unloading has applicable compliance monitoring conditions as specified below:
   (a) Daily visible emissions notations of the carbon black unloading stack exhausts, 285, 356A, 356B, 356C, 356D, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the carbon black baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the range of 6.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.

(c) An inspection shall be performed each calender quarter of all bags controlling the carbon black unloading operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced

(d) In the event that bag failure has been observed:

(1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the carbon black unloading must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The Banbury mixing, pellet spiraling for Banbury mixing, BB dump and pellet feed for Banbury mixing has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the Banbury mixing, BB dump and pellet feed for Banbury mixing processes stack exhausts, 200, 208, 210, 278, and 231 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall perform monthly trip checks of the fail safe pressure switches monitoring the Banbury mixing, BB dump and pellet feed for Banbury mixing operation baghouse differential pressures. The pressure switches shall cause the carbon loading to shut down if the baghouse differential is outside of the ranges of 4.0 to 8.0, 4.0 to 8.0, and 2.0 to 8.0 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure switches are not operating correctly.

(c) An inspection shall be performed each calender quarter of all bags controlling the Banbury mixing, BB dump and pellet feed for Banbury mixing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced

(d) In the event that bag failure has been observed:

(1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the Banbury mixing, BB dump and pellet feed for Banbury mixing must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

3. The WSW grinding and TUO Module Area and Quality assurance processes has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the WSW grinding and TUO Module Area and Quality assurance processes stack exhausts, 258-261, 265-277, and 33 and 37, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) Weekly inspections for leaks in the ductwork or the cyclone shall be performed. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when visible emissions are present.

(c) In the event that bag failure has been observed:
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cyclones for the TUO modules must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

4. The boilers #1 through #5 have applicable compliance monitoring conditions as specified below:

(a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations only when burning No. 6 fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Air Toxic Emissions

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

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See Title V air application for detailed air toxic calculations.

Conclusion

The operation of this rubber tire manufacturer shall be subject to the conditions of the attached proposed **Part 70 Permit No. T003-5974-00008.**