Mike Hough
GenCorp, Inc.
P.O. Box 507
Wabash, IN 46992

Re: **169-11387**
**Second Significant Source Modification to**
**Part 70 No.: T 169-5650-00004**

Dear Mr. Hough:

GenCorp, Inc. submitted an application for a Part 70 operation permit on April 1, 1996 for a rubber products manufacturing plant located at One General Street, Wabash, IN 46992. An application to modify the source was received on September 24, 1999. The request was made to modify existing process equipment at the plant. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction or modification at the source:

(a) one (1) Line #3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.

(b) One (1) extruded rubber product line #1, consisting of the following:
(1) Two (2) line #1 Extruders, with a maximum capacity of 1000 pounds per hour, and exhausting to the interior of the building,

(2) One (1) line #1 adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack F3-1, and

(3) One (1) line #1 natural gas hot air oven, with a rated heat input of 3.2 mmBtu per hour, and exhausting to stacks F2-15, F2-21, F2-28, and F2-33.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PR/EVP
cc: File - Wabash County
U.S. EPA, Region V
Wabash County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

# PART 70 SIGNIFICANT SOURCE MODIFICATION
# OFFICE OF AIR MANAGEMENT

**GenCorp, Inc.**
**One General Street**
**Wabash, IN 46992**

(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.

| | |
|---|---|
| 1st Significant Source Modification: 169-11083-00004 | Total Pages: 32 |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Management | Issuance Date: |
| 2ndSignificant Source Modification: 169-11387-00004 | Total Pages: |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Management | Issuance Date: |

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## 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 stationary rubber product manufacturing operation.

| | |
|---|---|
| Responsible Official: | John Keely |
| Source Address: | One General Street, Wabash, Indiana 46992 |
| Mailing Address: | One General Street, Wabash, Indiana 46992 |
| Phone Number: | (219) 569-5255 |
| SIC Code: | 3069, 3089 |
| County Location: | Wabash |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Minor Source, under PSD Rules;<br>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 source is approved to construct and operate the following emission units and pollution control devices:

(a) One (1) Line #3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.

(b) One (1) extruded rubber product line #1, consisting of the following:

(1) two (2) line #1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building,

(2) one (1) line #1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks F2-15, F2-21, F2-28, and F2-33, and

(3) one (1) line #1 adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack F3-1.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

## SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

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

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval 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 Effective Date of the Permit [IC13-15-5-3]

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.

(2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

(3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

## SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, 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).

C.2 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 approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, 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 failure to implement the Preventive Maintenance Plan 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. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 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 approval.

(b) Any application requesting an amendment or modification of this approval 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)]

C.4 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 approval:

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

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

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit***s*** vented to the control equipment is in operation.

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

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, 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 IDEM, OAM, 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.7 Compliance Monitoring [326 IAC 2-1.1-11]

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. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

C.8 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 approval;

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

(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 approval; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. 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 approval 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 approval; 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 approval, 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 approval 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 approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, 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.9 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 approval exceed the level specified in any condition of this approval, 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 approval conditions may be grounds for immediate revocation of the approval 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.10 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 approval 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 approval 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 approval.

(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.11 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 approval;

(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 failure to implement the Preventive Maintenance Plan 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 approval, and whether a deviation from an approval 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 approval issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval 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

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
(a) One (1) Line #3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.

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

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

The VOC potential emissions from this facility are less than two (2) tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase VOC potential emissions to 25 tons per year or more from this facility shall obtain OAM approval before such change may occur.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

The combined HAP potential emissions from this facility and the line #3 rubber extruding and curing equipment are less than two (2) tons per month, and individual HAP potential emissions are less than 0.8 tons per pollutant per month. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification which may:

(a) increase individual HAP potential emissions to 10 tons per year or more, or
(b) increase combined HAP potential emissions to 25 tons per year or more

from this facility and/or the line #3 rubber extruding and curing equipment shall obtain OAM approval before such change may occur.

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

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing 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.

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

D.1.4 Record Keeping Requirements

(a) To document compliance with the conditions in this section, 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 the conditions in this section.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(2) A log of the dates of use;
(3) The volume weighted VOC content of the coatings used;
(4) The cleanup solvent usage for each month;
(5) The total VOC usage for each month; and
(6) The weight of VOCs emitted for each compliance period.

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

D.1.5 Reporting Requirements

The Permittee is not required to submit reports on this facility by this permit. However, IDEM may require reporting when necessary to determine if the facility is in compliance. If reporting is required by IDEM, reports shall be submitted in accordance with Section C - General Reporting Requirements.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
(b) One (1) extruded rubber product line #1, consisting of the following:
(1) two (2) line #1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building, and
(2) one (1) line #1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks F2-15, F2-21, F2-28, and F2-33.

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

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC potential emissions from this facility are less than two (2) tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase VOC potential emissions to 25 tons per year or more from this facility shall obtain OAM approval before such change may occur.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter emissions from this facility shall not exceed the pound per hour emission rate established as E in the following formula:

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

For a process weight rate of 0.5 tons per hour, this equation specifies an emission limit of 2.58 pounds per hour.

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

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing 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.

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

D.2.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

D.2.5 Reporting Requirements

The Permittee is not required to submit reports on this facility by this permit.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
(b) One (1) extruded rubber product line #1, consisting of the following:
(3) one (1) line #1 adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack F3-1.

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. Potential VOC emissions from the line #1 flock adhesive operation are greater than 25 tons per year. VOC usage in the line #1 flock adhesive operation shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply. This usage limit will limit VOC emissions to less than 25 tons per year for the line #1 flock adhesive operation.

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

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing 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.

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

D.3.3 Record Keeping Requirements

(a) To document compliance with the conditions in this section, 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 the conditions in this section.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(2) A log of the dates of use;
(3) The volume weighted VOC content of the coatings used;
(4) The cleanup solvent usage for each month;
(5) The total VOC usage for each month; and
(6) The weight of VOCs emitted for each compliance period.

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

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: GenCorp, Inc.
Source Address: One General Street, Wabash, IN 46992
Mailing Address: P.O. Box 507, Wabash, IN 46992
Part 70 Permit No.: 169-11387-00004

**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: GenCorp, Inc.
Source Address: One General Street, Wabash, IN 46992
Mailing Address: P.O. Box 507, Wabash, IN 46992
Part 70 Permit No.: 169-11387-00004

**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)<br>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<br>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)<br>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: |

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| 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<br>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 Source Modification Quarterly Report

Source Name: GenCorp, Inc.
Source Address: One General Street, Wabash, IN 46992
Mailing Address: P.O. Box 507, Wabash, IN 46992
Source Modification No.: 169-11387-00004
Facility: One (1) line #1 adhesive application booth
Parameter: VOC
Limit: VOC usage in the line #1 flock adhesive operation shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | VOC Usage This Month (tons) | VOC Usage Previous 11 Months (tons) | 12 Month Total VOC Usage (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

## Addendum to the
## Technical Support Document for a Part 70 Significant Source Modification

| | |
|---|---|
| Source Name: | GenCorp, Inc. |
| Source Location: | One General Street, Wabash, IN 46992 |
| County: | Wabash |
| SIC Code: | 3069 |
| Operation Permit No.: | 169-5650-00004 |
| Source Modification No.: | SSM169-11387-00004 |
| Permit Reviewer: | Phillip Ritz/EVP |

On January 21, 2000, the Office of Air Management (OAM) had a notice published in the Wabash Plain Dealer, Wabash, Indiana, stating that GenCorp, Inc. had applied for a Part 70 Significant Source Modification to construct and operate a modification for an operation manufacturing various extruded rubber vehicle sealing products. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed Part 70 Significant Source Modification 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 February 14, 2000, Holly Padovani of EHS Technology Group, LLC, submitted comments on behalf of GenCorp, Inc. on the proposed Part 70 Significant Source Modification. The summary of the comments and corresponding responses is as follows:

**Comment 1**
On page 4 of 20 (Section A.1), the responsible official is listed to be Joe Blevens. The responsible official should actually be John Keely, Plant Manger. The phone number listed on this page is also incorrect. The general phone number to the plant is (219) 569-5255.

**Response 1**
Page 4 of 20 of the Permit has been revised to correct the listed Responsible Official and Phone Number in Section A.1. The changes to the permit are as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber product manufacturing operation.

| | |
|---|---|
| Responsible Official: | ~~Joe Blevens~~ **John Keely** |
| Source Address: | One General Street, Wabash, Indiana 46992 |
| Mailing Address: | One General Street, Wabash, Indiana 46992 |
| Phone Number: | ~~(765) 668-0455~~ **(219) 569-5255** |
| SIC Code: | 3069, 3089 |
| County Location: | Wabash |

**Comment 2**
On page 16 of 20, Section D.3.4 states that the emission unit in Section d.3 is not required to submit reports. However, page 20 of 20 contains a quarterly reporting form for this emission unit (Line #1 adhesive application booth). We are assuming that a quarterly report is required and that section D.3.4 needs to be corrected.

**Response 2**
Page 16 of 20 of the Permit has been revised to require the submittal of a quarterly report to show compliance with Condition D.3.1. The changes to Condition D.3.4 are as follows:

~~The Permittee is not required to submit reports on this facility by this permit. However, IDEM may require reporting when necessary to determine if the facility is in compliance. If reporting is required by IDEM, reports shall be submitted in accordance with Section C - General Reporting Requirements.~~

**A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

**Comment 3**
On page 1 of 6 of the TSD the operating permit issuance date is listed as April 1, 1996. This is not correct since the part 70 permit has not yet been issued.

**Response 3**
The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Page 1 of 6 of the TSD has been revised as follows to remove the incorrect information:

Operation Permit No.: 169-5650-00004
~~Operation Permit Issuance Date: April 1, 1996~~

# Indiana Department of Environmental Management
# Office of Air Management

## Technical Support Document (TSD) for a Part 70 Significant Source Modification.

### Source Background and Description

| | |
|---|---|
| **Source Name:** | **GenCorp, Inc.** |
| **Source Location:** | **One General Street, Wabash, IN 46992** |
| **County:** | **Wabash** |
| **SIC Code:** | **3069** |
| **Operation Permit No.:** | **169-5650-00004** |
| **Operation Permit Issuance Date:** | **April 1, 1996** |
| **Source Modification No.:** | **SSM169-11387-00004** |
| **Permit Reviewer:** | **Phillip Ritz/EVP** |

The Office of Air Management (OAM) has reviewed a modification application from GenCorp, Inc., which manufactures various extruded rubber vehicle sealing products, relating to the construction of the following emission units and pollution control devices:

(a) One (1) Line #3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.

(b) One (1) extruded rubber product line #1, consisting of the following:

(1) two (2) line #1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building,

(2) one (1) line #1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks F2-15, F2-21, F2-28, and F2-33, and

(3) one (1) line #1 adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack F3-1.

### History

GenCorp, Inc. submitted a Part 70 permit application for an automobile parts manufacturing plant on April 1, 1996, and is currently under IDEM's review.

The emission source has since received one first significant source modification, two registration letters and one construction permit since April 1, 1996. These approvals and the proposed modification will be incorporated into the pending Part 70 permit.

**Stack Summary**

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature ($^0$F) |
|---|---|---|---|---|---|
| F2-15 | oven | 30 | 1.00 | 500 | <500 |
| F2-21 | oven | 30 | 1.00 | 700 | <500 |
| F2-28 | oven | 33 | 0.67 | 700 | <500 |
| F2-33 | oven | 31 | 1.50 | 700 | <500 |
| F3-1 | adhesive | 29 | 1.33 | 600 | ambient |
| F2-56 | topcoat | 27 | 2.00 | 5290 | ambient |

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Significant Source Modification 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 application for the purposes of this review was received on September 24, 1999.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6.)

**Potential To Emit of Modification**

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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 4.80 |
| PM-10 | 4.80 |
| SO2 | 0.01 |
| VOC | 36.70 |
| CO | 1.18 |
| NOx | 1.40 |

| HAP's | Potential To Emit (tons/year) |
|---|---|
| 1,4-Dichlorobenzene | 0.00 |
| 1,3-Butadiene | 0.00 |
| MEK (2-Butanone) | 0.01 |
| MIBK | 0.00 |
| Acetaldehyde | 0.00 |

| | |
|---|---|
| Acrylonitrile | 0.00 |
| Acetophenone | 0.00 |
| Aniline | 0.00 |
| Benzene | 0.07 |
| Benzidine | 0.00 |
| Biphenyl | 0.00 |
| 4,4' - Diphenylmethane diisocyanate | 1.09 |
| bis-(2-Ethylhexyl)phthalate | 0.00 |
| Carbon Disulfide | 1.22 |
| Carbonyl Sulfide | 0.00 |
| Cumene | 0.00 |
| Di-n-butylphthalate | 0.00 |
| Glycol Ethers | 0.98 |
| Ethylbenzene | 5.46 |
| Methyl Isobutyl Ketone | 5.45 |
| Methylene Chloride | 0.01 |
| Xylene | 13.62 |
| Napthalene | 0.00 |
| n-Hexane | 0.01 |
| O-Xylene | 0.02 |
| Phenol | 0.00 |
| Styrene | 0.00 |
| Tetrachloroethene | 0.00 |
| Toluene | 0.10 |
| TOTAL | 27.13 |

**Justification for Modification**

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) is greater than 25 tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP and any combination of HAPs is greater than 10 and 25 tons per year, respectively. Therefore, this modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4).

**County Attainment Status**

The source is located in Wabash County.

| Pollutant | Status |
|---|---|
| PM-10 | attainment |
| $SO_2$ | attainment |
| $NO_2$ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

(a) 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. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Wabash County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Source Status**

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 130.5 |
| PM-10 | 130.5 |
| $SO_2$ | 20.0 |
| VOC | 249.0 |
| CO | 100.0 |
| $NO_x$ | 249.0 |

| HAP's | Potential To Emit (tons/year) |
|---|---|
| Single HAP | >10.0 |
| Total HAP | > 25.0 |

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the potential to emit table from the first significant source modification SSM169-11083-00004, issued on April 6, 1999.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

| | Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | HAPs |
| Line #1 Rubber Extrusion and Cutting | 0.12 | 0.12 | 0.00 | 9.41 | 0.00 | 0.00 | 1.53 |
| Line #1 Flock Adhesive Operation | 0.00 | 0.00 | 0.00 | Less than 25 | 0.00 | 0.00 | 23.35 |
| Line #3 Topcoat Operation | 0.93 | 0.93 | 0.00 | 0.93 | 0.00 | 0.00 | 0.00 |
| Line #1 Natural Gas Combustion | 0.11 | 0.11 | 0.01 | 0.08 | 1.18 | 1.40 | 0.00 |
| Totals | 1.16 | 1.16 | 0.01 | Less than 35.42 | 1.18 | 1.40 | 24.88 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| PSD Significance Levels | 250 | 250 | 250 | 250 | 250 | 250 | 250 |

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Subpart BBB is not applicable since the product is not rubber tires.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

**State Rule Applicability - Individual Facilities**

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

The Line #1 Rubber Extrusion and Cutting Operation, Line #1 Flock Adhesive Operation and Line #1 Natural Gas Combustion are not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The emission units were existing as of July 27, 1997 and this revision is not classified as a reconstruction under 40 CFR 63.41.

The new Line #3 Topcoat spray booth does not by itself have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, and is therefore not subject to 326 IAC 2-4.1-1 (New Source Toxics Control).

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 pollutants specified in the rule. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must 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 (Visible Emissions 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:

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

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

**State Rule Applicability - Line #1 Rubber Extruders (Extrusion & Curing Operations)**

326 IAC 6-3-2 (Particulate Emissions Limitations)

These emission units are subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

For a process weight rate of 0.5 tons per hour, this equation specifies an emission limit of 2.58 pounds per hour.

According to the emission calculations, the Line #1 Rubber Extruders (Extrusion & Curing Operations) have a potential to emit (PTE) PM of 0.03 pounds per hour, and the source is in compliance with the requirement. (See emission calculations, pages 6 of 6).

326 IAC 8-1-6 (General VOC Reduction Requirements)

These emission units are not subject to 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit volatile organic compounds is less than twenty-five (25) tons per year. Therefore, the BACT (best available control technology) requirements do not apply.

No other article 8 rules apply.

**State Rule Applicability -Line #3 Topcoat Operation**

326 IAC 8-1-6 (General VOC Reduction Requirements)

These emission units are not subject to 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit volatile organic compounds is less than twenty-five (25) tons per year. Therefore, the BACT (best available control technology) requirements do not apply.

No other article 8 rules apply.

**State Rule Applicability - Line #1 Adhesive Application Booth**

326 IAC 8-1-6 (General VOC Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. Potential VOC emissions from the line #1 flock adhesive operation are greater than 25 tons per year. VOC usage in the line #1 flock adhesive operation shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply. This usage limit will limit VOC emissions to less than 25 tons per year for the line #1 flock adhesive operation. Potential VOC emissions from the line #3 topcoat spray booth and rubber extruding and curing equipment operation are less than 25 tons per year, therefore the requirements of 326 IAC 8-1-6 do not apply.

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 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 attached calculations for detailed air toxic calculations. (Appendix A, pages 3 and 4 of 6)

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed **Part 70 Significant Source Modification No. 169-11387-00004.**

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

**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr |
|---|---|
| 3.2 | 28.0 |

Heat Input Capacity includes:
One (1) Natural Gas Hot Air Oven, rated at 3.2 mmBtu per hour

| | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 0.6 | 100.0 **see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.03 | 0.11 | 0.01 | 1.40 | 0.08 | 1.18 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

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

**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

HAPs - Organics

| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
|---|---|---|---|---|---|
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 2.943E-05 | 1.682E-05 | 1.051E-03 | 2.523E-02 | 4.765E-05 |

HAPs - Metals

| | Lead | Cadmium | Chromium | Manganese | Nickel |
|---|---|---|---|---|---|
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 7.008E-06 | 1.542E-05 | 1.962E-05 | 5.326E-06 | 2.943E-05 |

Methodology is the same as page 1.

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

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Rubber Extrusion**

**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

Emission Factors from RMA

Maximum Line Capacity **1000** lb rubber/hour

Emission Factors

Curing

**2.09E-03** case for all rubber types)

Extrusion

**5.87E-05** case for all rubber types)

**2.66E-05** case for all rubber types)

Emission Calculations

| | VOC | | PM | |
|---|---|---|---|---|
| | lb/hr | tons/year | lb/hr | tons/year |
| Curing | 2.09 | 9.15 | 0.00 | 0.00 |
| Extrusion | 0.06 | 0.26 | 0.03 | 0.12 |
| | VOC | | PM | |
| **Totals** | **2.15** | **9.41** | **0.03** | **0.12** |

HAP Emission Factors

Curing (emission factors for autoclave with EPDM sulfur cure rubber)

**6.50E-04** organic/lb rubber processed

**4.66E-04** processed

Extrusion

**2.62E-05** emission factor for extrusion with EPDM peroxide cure rubber)

**2.02E-05** components from Banbury mills and/or curing %'s)

Emission Calculations

| | Rubber Curing | | Extrusion | | |
|---|---|---|---|---|---|
| HAP | % by weight | Line 3 Oven TPY | % by weight | Line 3 TPY | Total HAPs TPY |
| 1,4-Dichlorobenzene | 0.01% | 2.04E-04 | 0.01% | 8.85E-06 | 2.13E-04 |
| 1,3-Butadiene | | 0.00E+00 | 0.19% | 1.68E-04 | 1.68E-04 |
| MEK (2-Butanone) | 0.51% | 1.04E-02 | 0.84% | 7.43E-04 | 1.12E-02 |
| MIBK | | 0.00E+00 | 0.21% | 1.86E-04 | 1.86E-04 |
| Acetaldehyde | 0.04% | 8.16E-04 | 0.04% | 3.54E-05 | 8.52E-04 |
| Acrylonitrile | | 0.00E+00 | 0.11% | 9.73E-05 | 9.73E-05 |
| Acetophenone | 0.02% | 4.08E-04 | 0.02% | 1.77E-05 | 4.26E-04 |
| Aniline | 0.13% | 2.65E-03 | 0.13% | 1.15E-04 | 2.77E-03 |
| Benzene | 3.34% | 6.82E-02 | 3.34% | 2.96E-03 | 7.11E-02 |
| Benzidine | 0.01% | 2.04E-04 | 0.01% | 8.85E-06 | 2.13E-04 |
| Biphenyl | 0.01% | 2.04E-04 | 0.01% | 8.85E-06 | 2.13E-04 |
| bis-(2-Ethylhexyl)phthalate | 0.06% | 1.22E-03 | 0.06% | 5.31E-05 | 1.28E-03 |
| Carbon Disulfide | 57.47% | 1.17E+00 | 57.47% | 5.08E-02 | 1.22E+00 |
| Carbonyl Sulfide | | 0.00E+00 | 2.21% | 1.96E-03 | 1.96E-03 |
| Cumene | 0.01% | 2.04E-04 | 0.16% | 1.42E-04 | 3.46E-04 |
| Di-n-butylphthalate | | 0.00E+00 | 0.01% | 8.85E-06 | 8.85E-06 |
| Ethylbenzene | 0.58% | 1.18E-02 | 0.58% | 5.13E-04 | 1.24E-02 |
| Methylene Chloride | 0.46% | 9.39E-03 | 0.80% | 7.08E-04 | 1.01E-02 |
| m/p-Xylene | 2.91% | 5.94E-02 | 2.91% | 2.57E-03 | 6.20E-02 |
| Napthalene | 0.04% | 8.16E-04 | 0.05% | 4.42E-05 | 8.61E-04 |
| n-Hexane | 0.59% | 1.20E-02 | 2.11% | 1.87E-03 | 1.39E-02 |
| O-Xylene | 0.72% | 1.47E-02 | 0.72% | 6.37E-04 | 1.53E-02 |
| Phenol | | 0.00E+00 | 0.05% | 4.42E-05 | 4.42E-05 |
| Styrene | | 0.00E+00 | 0.07% | 6.19E-05 | 6.19E-05 |
| Tetrachloroethene | | 0.00E+00 | 0.13% | 1.15E-04 | 1.15E-04 |
| Toluene | 4.81% | 9.82E-02 | 4.81% | 4.26E-03 | 1.02E-01 |
| Total | 71.72% | 1.46 | 77.05% | 0.07 | **1.53** |

Methodology: rubber since there were not emission factors for sulfur rubber throughput.

**Appendix A: Emission Calculations**
**HAP Emission Calculations**



**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

Glue Application Booth for Line #1

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Methyl Isobutyl Ketone | Weight % Ethyl Benzene | Weight % 4,4' - Diphenylmethane diisocyanate | Weight % Methanol | Xylene Emissions (ton/yr) | Methyl Isobutyl Ketone Emissions (ton/yr) | Ethyl Benzene Emissions (ton/yr) | 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr) | Methanol Emissions (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Flock Adhesive | 8.3 | 0.00150 | 1000.000 | 25.00% | 10.00% | 10.00% | 2.00% | 0.00% | 13.62 | 5.45 | 5.45 | 1.09 | 0.00 |
| | | | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | | | | | | | | | **13.62** | **5.45** | **5.45** | **1.09** | **0.00** |

Total State Potential Emissions 25.60

| Limit Usage: VOC | Limit Usage: Xylene Emissions (ton/yr) | Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr) | Limit Usage: Ethyl Benzene Emissions (ton/yr) | Limit Usage: Diphenylmethane diisocyanate Emissions (ton/yr) | Limit Usage: Methanol Emissions (ton/yr) |
|---|---|---|---|---|---|
| 8.77% | **12.42** | **4.97** | **4.97** | **0.99** | **0.00** |

23.35

Topcoat Spray Booth for Line #3

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Glycol Ether | Glycol Ether Emissions (ton/yr) |
|---|---|---|---|---|---|
| Coating 8370A/8370C | 8.9 | 0.50000 | 1.000 | 5.00% | 0.98 |
| | | | | 0.00% | 0.00 |
| | | | | | **0.98** |

Total State Potential Emissions

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Unit = pounds of rubber

# Appendix A: Emission Calculations

**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

## Uncontrolled Potential Emissions (tons/year)

| | Emissions Generating Activity | | | | |
|---|---|---|---|---|---|
| Pollutant | Lin #1 Rubber Extrusion and Cutting | Line #1 Flock Adhesive Application | Line #3 Surface Coating (Topcoat) | Line #1 Natural Gas Combustion | **TOTAL** |
| PM | 0.12 | 0.00 | 4.65 | 0.03 | 4.80 |
| PM10 | 0.12 | 0.00 | 4.65 | 0.11 | 4.88 |
| SO2 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 |
| NOx | 0.00 | 0.00 | 0.00 | 1.40 | 1.40 |
| VOC | 9.41 | 26.31 | 0.93 | 0.08 | 36.73 |
| CO | 0.00 | 0.00 | 0.00 | 1.18 | 1.18 |
| total HAPs | 1.53 | 25.60 | 0.98 | 0.00 | 28.11 |
| worst case single HAP | 1.22 (Carbon Disulfide) | 13.62 (Xylene) | 0.98 (Glycol Ether) | 0.00 | 13.62 (Xylene) |

Total emissions based on rated capacity at 8,760 hours/year.

## Controlled Potential Emissions (tons/year)

| | Emissions Generating Activity | | | | |
|---|---|---|---|---|---|
| Pollutant | Rubber Extrusion and Cutting | Flock Adhesive Application | Line #3 Surface Coating (Topcoat) | Natural Gas Combustion | **TOTAL** |
| PM | 0.12 | 0.00 | 0.93 | 0.03 | 1.08 |
| PM10 | 0.12 | 0.00 | 0.93 | 0.11 | 1.16 |
| SO2 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 |
| NOx | 0.00 | 0.00 | 0.00 | 1.40 | 1.40 |
| VOC | 9.41 | 24.00 | 0.93 | 0.08 | 34.42 |
| CO | 0.00 | 0.00 | 0.00 | 1.18 | 1.18 |
| total HAPs | 1.53 | 23.35 | 0.98 | 0.00 | 25.86 |
| worst case single HAP | 1.22 (Carbon Disulfide) | 12.42 (Xylene) | 0.98 (Glycol Ether) | 0.00 | 12.42 (Xylene) |

Total emissions based on rated capacity at 8,760 hours/year, after control.

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

**Company Name:** GenCorp, Inc.
**Address City IN Zip:** One General Street, Wabash, IN 46992
**CP:** 169-11387
**Plt ID:** 169-00004
**Reviewer:** PR/EVP
**Date:** September 24, 1999

Glue Application Booth for Line #1

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Flock Adhesive | 8.3 | 48.30% | 0.0% | 48.3% | 0.0% | 45.40% | 0.00150 | 1000.000 | 4.00 | 4.00 | 6.01 | 144.15 | 26.31 | 0.00 | 8.82 | 100% |
| | 0.0 | 0.00% | 0.0% | 0.0% | 0.0% | 0.00% | 0.00000 | 0.000 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | ERR | 0% |

**State Potential Emissions** **Add worst case coating to all solvents** **6.01** **144.15** **26.31** **0.00**

| Limit Usage: PM | Limit Usage: VOC | Control Efficiency: VOC | Control Efficiency: PM | Limit Usage: VOC lbs per Hour | Limit Usage: VOC lbs per Day | Limit Usage: VOC tons per Year | Limit Usage: PM |
|---|---|---|---|---|---|---|---|
| 0.00% | 8.77% | 0.00% | 0.00% | **5.48** | **131.51** | **24.00** | **0.00** |

Topcoat Spray Booth for Line #3

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Coating 8370A/8370C | 8.9 | 4.75% | 0.0% | 4.8% | 0.0% | 45.40% | 0.50000 | 1.000 | 0.42 | 0.42 | 0.21 | 5.08 | 0.93 | 4.65 | 0.93 | 75% |
| | 0.0 | 0.00% | 0.0% | 0.0% | 0.0% | 0.00% | 0.00000 | 0.000 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | ERR | 0% |

**State Potential Emissions** **Add worst case coating to all solvents** **0.21** **5.08** **0.93** **4.65**

| Control Efficiency: VOC | Control Efficiency: PM | Limit Usage: VOC lbs per Hour | Limit Usage: VOC lbs per Day | Limit Usage: VOC tons per Year | Limit Usage: PM |
|---|---|---|---|---|---|
| 0.00% | 80.00% | **0.21** | **5.08** | **0.93** | **0.93** |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Unit = pounds of rubber