Mr. Mike Ledzianowski
Plastech
1170 North State Road #37
Elwood, IN 46036

Re: AAT 095-10019-00044
First Administrative Amendment to
Part 70 Permit No.: T095-6536-00044

Dear Mr. Ledzianowski:

Paint and Assembly Corporation (PAC) was issued Part 70 Operating Permit T095-6536-00044 on October 9, 1998 for the operation of a motor vehicle plastic and metal parts coating source in Elwood, Indiana. A letter was received on August 18, 1998 notifying the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), that the PAC plant was conditionally planned for purchase by Plastech after issuance of the Part 70 permit. On a preliminary basis Plastech requested certain administrative changes be made to the permit after its issuance, but they indicated their intent to re-notify the OAM upon their purchase of the PAC plant. Plastech submitted written notification to the OAM on February 16, 1999 indicating that they had purchased the PAC plant on October 1, 1998. On February 18, 1999, OAM requested Plastech to confirm and/or clarify the administrative changes requested in their August 18, 1998 letter. On April 7, 1999 Plastech submitted an updated request to OAM for administrative changes to Part 70 permit T095-6536-00044. The letter requested the permit be amended to reflect the following changes:

(a) A new company name.

(b) A new company mailing address.

(c) A new responsible official.

(d) Descriptive changes to the equipment listings for surface coating facilities as follows:

(1) Plastech will coat many types of plastic parts, in addition to the plastic automotive parts solely coated by PAC. Therefore, a descriptive change to generically reflect “plastic parts” is requested. Further, to account for the possible coating of a greater number of smaller plastic parts, versus the few relatively large plastic parts coated by PAC, Plastech requests the processing rates (as plastic parts coated per hour) be increased. This descriptive change will not increase the coating input usage nor alter limited potential to emit volatile organic compounds (VOC) of the Part 70 permit;

(2) Clarify the booth designations and application methods to accurately reflect the process flow on the six (6) booth coating line designated as the *Spray Coating Line*. Part 70 permit T095-6536-00044, issued on October 9, 1998, included Enhanced New Source Review (ENSR) approval for two (2) booths to be added to the existing four (4) booth line. The entire coating line is one (1) facility. The application for such approval did not accurately describe the process flow associated with the modified facility. The corrected process flow follows:

Process Step No.	**Booth Designation**	**Application Method**
1	Adhesion Promoter/Primer Booth (ENSR)	Electrostatic
2	Paint Booth #1	Electrostatic
3	Paint Booth #2	Electrostatic
4	Paint Booth #3	Electrostatic
5	Paint Booth #4	Electrostatic

6	Paint Booth #5 (ENSR)	Electrostatic

Paint Booth #5 was originally planned to be the Primer Booth in the Part 70/ENSR permit application; however, both adhesion and primer coating operations will be combined in one booth (step 1) and the coatings will be applied on a mutually exclusive basis. Paint Booth #5 will be used for finished product inspection purposes, with coating usage only planned for product touch-up. Such activities are well within the emission limits computed in the ENSR determination for both booths. No change to limited potential to emit VOC is proposed and actual emissions should decrease due to this process clarification.

(3) Revise the description of Paint Booths #3 and #4 such that a specific processing rate for clear coat usage is removed from the permit. This rate was made as an amended operating condition by the OAM in order to approve a request made by the previous owner (PAC) that would allow for utilization of an alternate new application system whose installation would not affect the existing best available control technology (BACT) determination for the two booths.

Specifically, Operation Permit 48-01-94-0096, issued by IDEM on February 13, 1990, determined BACT for each booth to be the utilization of an electrostatic air atomization application system. In 1996 PAC requested OAM to make a determination on BACT equivalency for installation of an alternative new application system (i.e., air assisted airless spray applicators). This new system would be used only for a then new product line (i.e. plastic bumper covers) which would be coated with clear coat. While PAC felt that the use of the electrostatic application system would not be technologically feasible for coating the new product, it was their objective not to invalidate the February 1990 BACT determination. On May 23, 1996, OAM issued Amendment A095-5819 to Operation Permit 48-01-94-0096. The amendment conditionally determined the 1990 BACT determination to be valid when using the air assisted airless spray application system by limiting total clear coat usage to 8 gallons per day. The limit was intended to account for the transfer efficiency differences between the electrostatic and airless application systems. Unlike PAC, Plastech has determined that only one application system is necessary to coat all plastic parts, including bumper covers. Therefore, Plastech will eliminate the alternate airless spray application system and utilize only electrostatic air atomization in each booth. Because this application method reflects the original source configuration, it complies with the original BACT requirement, it results in the best transfer efficiency of the two application systems, and it does not alter the limited potential to emit VOC of the Part 70 permit, this request is not considered to be environmentally significant pursuant to 326 IAC 2-7-11(a)(7). Therefore, Plastech requests the removal of the clear coat limit for bumper covers.

(4) Remove reference to the metallic parts *Dip Coating Line*. This process line has been removed from the source and it will not be operated by Plastech.

Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended. The Part 70 permit T095-6536-00044 cover page is amended to reflect a new source name. The reporting forms, pages 38 through 43, are all amended to reflect a new source name and mailing address, except for the monthly clear coating usage reporting form, page 41, which is eliminated from the permit consistent with paragraph (d)(3) above.

1. Condition A.1 (General Information), page 5 of 43, is amended as follows:

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

The Permittee owns and operates a ~~motor vehicle~~ plastic ~~and metal~~ parts coating source.

Responsible Official:	~~James Maus~~ **Mike Ledzianowski**
Source Address:	SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address:	~~P.O. Box 496, Elwood, Indiana 46036~~ **11700 North State Road #37, Elwood, Indiana 46036**
SIC Code:	3714
County Location:	Madison
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

2. Condition A.2 (Emission Units and Pollution Control Equipment Summary), page 5 of 43, and Facility Descriptions in Section D.1, page 32 of 43, and Section D.2, page 36 of 43, are amended as follows:

(a) Spray Coating Line:

(1) One (1) coating booth, identified as Paint Booth #1, coating a maximum of ~~240~~ **3,000** plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;

(2) One (1) coating booth, identified as Paint Booth #2, coating a maximum of ~~240~~ **3,000** plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;

(3) One (1) coating booth, identified as Paint Booth #3, coating a maximum of ~~240~~ **3,000** plastic parts per hour ~~or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers~~, equipped with ~~both an air assisted airless spray application system used when coating plastic automotive bumper covers and~~ an electrostatic air atomization spray application system ~~used when coating all other plastic parts,~~ and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;

(4) One (1) coating booth, identified as Paint Booth #4, coating a maximum of ~~240~~ **3,000** plastic parts per hour ~~or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers~~, equipped with ~~both an air assisted airless spray application system used when coating plastic automotive bumper covers and~~ an electrostatic air atomization spray application system ~~used when coating all other plastic parts,~~ and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;

(5) One (1) coating booth, identified as the Adhesion Promoter**/Primer** Booth, coating a maximum of ~~240~~ **3,000** plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and

(6) One (1) coating booth, identified as ~~the Primer Booth, coating a maximum of 240 plastic parts per hour,~~ **Paint Booth #5 to be utilized for parts inspection and touch-up,** equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C~~; and~~ .

~~(b) Dip Coating Line:~~

~~(1) Three (3) dip tanks identified as Dip Tank #1, Dip Tank #2 and Dip Tank #3 coating a total of 1,560 metal parts per hour, each equipped with a drain back and cover, all exhausting at one (1) stack identified as PDRE.~~

3. Condition D.1.1 (Volatile Organic Compounds (VOC)), pages 32 and 33 of 43, is amended to reflect the use of only electrostatic spray applicators as BACT, and to eliminate the alternative air assisted airless spray application system in Paint Booth #3 and #4 with the corresponding removal of the clear coat usage limit when such application system was used, as explained in paragraph (d)(3) above:

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

~~(a) The surface coating applied to plastic automotive bumper covers in Paint Booth Nos. 3 and 4 shall utilize an air assisted airless spray application system.~~

~~(b)~~**(a)** The surface coating applied to all ~~other~~ plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.

~~(c) The total clear coat paint usage shall not exceed eight (8) gallons per day when coating plastic automotive bumper covers in Paint Booth Nos. 3 and 4.~~

~~(d)~~**(b)** The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., Paint Booth Nos.1 - ~~4~~, **5 and** the Adhesion Promoter**/Primer** Booth~~ and the Primer Booth~~), including solvent usage, minus the VOC solvent shipped out, shall be limited to 241.0 tons per twelve (12) consecutive month period.

~~(e)~~**(c)** The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

4. Condition D.1.2 (Volatile Organic Compounds (VOC)), page 33 of 43, is removed because the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not applicable to the source. Plastech has eliminated the metal parts coating operations at the source by removing the *Dip Coating Line*. All subsequent conditions of Section D.1, pages 33 through 35 of 43, have been re-numbered accordingly.

~~D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]~~

~~(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied at the Dip Coating Line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air (less than 90EC or 194EF) dried coatings.~~

~~(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

5. Condition D.1.3 (re-numbered to Condition D.1.2) (PSD Minor Limit), page 33 of 43, is amended to reflect the revised facility descriptions:

D.1.~~3~~**2** PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total volatile organic compound (VOC) input usage to source-wide surface coating (i.e, the Spray Coating Line inclusive of Paint Booth Nos. 1 - ~~4,~~ **5 and** the Adhesion Promoter**/Primer** Booth ~~and the Primer Booth; the Dip Coating Line inclusive of Dip Tank Nos. 1 - 3~~; and the coating materials test booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 247.7 tons per twelve (12) consecutive month period. This input limitation is equivalent to source-wide VOC emissions of less than 250 tons per twelve (12) consecutive month period and compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

6. Condition D.1.6 (re-numbered to Condition D.1.5) (Testing Requirements) and D.1.7 (re-numbered to Condition D.1.6) (Volatile Organic Compounds (VOC)), page 33 of 43, are amended to eliminate reference to old Condition D.1.2 as discussed in paragraph 4 above, and to reflect re-numbering of the permit conditions:

D.1.~~6~~**5** 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 the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and ~~D.1.3~~ **D.1.2** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.~~7~~**(6)** Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 **and** D.1.2 ~~and ,D.1.3,~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, and Anderson Office of Air Management reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

7. Condition D.1.11 (re-numbered to Condition D.1.10) (Record Keeping Requirements), page 35 of 43, is amended to eliminate reference to old Condition D.1.2 as discussed in paragraph 4 above, to eliminate reference to the alternative air assisted airless application system and clear coat usage in Paint Booth #3 and #4 as discussed in paragraph 3 above, and to reflect re-numbering of the permit conditions:

D.1.~~11~~**10** Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 **and** D.1.2 ~~and ,D.1.3,~~ the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(5)** below. Records maintained for (1) through ~~(6)~~ **(5)** shall be taken monthly~~, except for item (5) which shall be daily,~~ and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 **and** D.1.2 ~~and ,D.1.3,~~.

(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. 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 volume weighted VOC content of the coatings used each month;

(4) The cleanup solvent usage for each month;

~~(5) The total clear coat used for each day; and~~

~~(6)~~**(5)** The total VOC input usage for each month.

(b) To document compliance with Conditions ~~D.1.9 and D.1.10~~ **D.1.8 and D.1.9**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

8. Condition D.1.12 (re-numbered to Condition D.1.11) (Reporting Requirements), page 35 of 43, is amended to eliminate reference to old Condition D.1.2 as discussed in paragraph 4 above, and to reflect re-numbering of the permit conditions:

D.1.~~12~~**11** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and ~~D.1.3~~ **D.1.2** shall be submitted to the addresses 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 being reported.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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 Michael Hirtler, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (973) 575-2555, extension 3229.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments:
MH/EVP
c: File - Madison County
U.S. EPA, Region V
Madison County Health Department
Anderson Office of Air Management
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and ANDERSON OFFICE OF AIR MANAGEMENT

Plastech
SR 37 and Brickyard Road
Elwood, Indiana 46036

(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.: T095-6536-00044	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: October 9, 1998

First Administrative Amendment: AAT095-10019	Pages Affected: Cover page, 5,6,32 - 36, 38-40, 42, 43
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and Anderson Office of Air Management. 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 plastic parts coating source.

Responsible Official:	Mike Ledzianowski
Source Address:	SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address:	11700 North State Road #37, Elwood, Indiana 46036
SIC Code:	3714
County Location:	Madison
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor 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) Spray Coating Line:

(1) One (1) coating booth, identified as Paint Booth #1, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;

(2) One (1) coating booth, identified as Paint Booth #2, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;

(3) One (1) coating booth, identified as Paint Booth #3, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;

(4) One (1) coating booth, identified as Paint Booth #4, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;

(5) One (1) coating booth, identified as the Adhesion Promoter/Primer Booth, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system or air assisted airless spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and

(6) One (1) coating booth, identified as Paint Booth #5 to be utilized for parts inspection and touch-up, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C.

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):

(a) Coating materials test booth.

(b) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, all exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.

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 D.1 FACILITY OPERATION CONDITIONS

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

(a) Spray Coating Line:

(1) One (1) coating booth, identified as Paint Booth #1, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;

(2) One (1) coating booth, identified as Paint Booth #2, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;

(3) One (1) coating booth, identified as Paint Booth #3, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;

(4) One (1) coating booth, identified as Paint Booth #4, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;

(5) One (1) coating booth, identified as the Adhesion Promoter/Primer Booth, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system or air assisted airless spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and

(6) One (1) coating booth, identified as Paint Booth #5 to be utilized for parts inspection and touch-up, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C.

and the following specifically regulated insignificant activity, as defined in 326 IAC 2-7-1(21):

(a) Coating materials test booth.

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

(a) The surface coating applied to all plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.

(b) The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., Paint Booth Nos.1 - 5 and the Adhesion Promoter/Primer Booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 241.0 tons per twelve (12) consecutive month period.

(c) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total volatile organic compound (VOC) input usage to source-wide surface coating (i.e, the Spray Coating Line inclusive of Paint Booth Nos. 1 - 5 and the Adhesion Promoter/Primer Booth; and the coating materials test booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 247.7 tons per twelve (12) consecutive month period. This input limitation is equivalent to source-wide VOC emissions of less than 250 tons per twelve (12) consecutive month period and compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the Spray Coating Line 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

or

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

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.1.5 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 the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, and Anderson Office of Air Management reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1(b) and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.8 Particulate Matter (PM)

The waterwash for PM control shall be in operation at all times when Spray Coating Line booths are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, daily observations shall be made of the overspray from the surface coating booth stacks (E1A, E1B and E1C; E2A, E2B and E2C; E3A and E3B; E4A and E4B; ADB1A and ADB1B; and PB1A, PB1B and PB1C) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) 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.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly, except for item (5) which shall be daily, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(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. 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 volume weighted VOC content of the coatings used each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC input usage for each month.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses 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 being reported.

SECTION D.2 FACILITY CONDITIONS

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

The modification of the Spray Coating Line by the construction of the following:

(a) One (1) coating booth, identified as the Adhesion Promoter/Primer Booth, coating a maximum of 3,000 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and

(b) One (1) coating booth, identified as Paint Booth #5 to be utilized for parts inspection and touch-up, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C; and

(c) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, and Anderson Office of Air Management may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Plastech
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: 11700 North State Road #37, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

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: 317-233-6865

and ANDERSON OFFICE OF AIR MANAGEMENT

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Plastech
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: 11700 North State Road #37, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

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:

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 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
AND ANDERSON OFFICE OF AIR MANAGEMENT

Part 70 Quarterly Report

Source Name: Plastech
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: 11700 North State Road #37, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044
Facilities: (a) Spray Coating Line (Paint Booth Nos. 1 - 5, Adhesion Promoter/Primer Booth)
(b) Source-wide Coating Operations (Spray Coating Line Paint Booth Nos. 1 - 5, Adhesion Promoter/Primer Booth; and coating materials test booth)
Parameter: Total VOC input usage
Limit: (a) 241.0 tons per twelve (12) consecutive months for Spray Coating Line
(b) 247.7 tons per twelve (12) consecutive months for Source-wide Coating Operations

YEAR: _____

Facility	Month	VOC Input Usage (tons/month)
Spray Coating Line		
Source-wide Coating Operations		

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
AND ANDERSON OFFICE OF AIR MANAGEMENT

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Plastech
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: 11700 North State Road #37, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

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.1.9)	**Number of Deviations**	**Date of each Deviation**

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

Attach a signed certification to complete this report.