

Mr. Joseph W. Taylor
H.A. Parts Products of Indiana Company
2200 SR 240 East
Greencastle, Indiana 46135

Dear Mr. Taylor:

Re: Exempt Construction and Operation Status,
133-11073-00019

The application from H.A. Parts Products of Indiana Company, received on June 17, 1999 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following modification to the existing plastic automotive trim surface coating operation, to be located at 2200 SR 240 East, Greencastle, Indiana, is classified as exempt from air pollution permit requirements:

- (a) The addition of one (1) robotic spray gun in the existing paint spray booth, identified as Booth E, utilizing a High Volume Low Pressure (HVLP) spray application system, allowing for the coating of an additional 4 plastic automotive trim pieces per hour for a maximum total of 65 pieces per hour being coated in Booth E. The spray booth utilizes a closed loop internal mix manifold system and a water wash system for overspray control. The additional robotic gun exhausts through one (1) stack, identified as Stack No. 3.

The following conditions shall continue to apply to Booth E:

- (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:
 - (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 15 minutes (60 readings) in a 6-hour period 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.
- (2) Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the best available control technology for the spray coating of plastic automobile trim pieces in Booth E shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times that the booth is in operation. The total amount of volatile organic compounds (VOC) delivered to the applicators in spray booths A, B, D, and E shall not exceed 2.85 tons per month.
- (3) Pursuant to 326 IAC 6-3-2(c), the PM from the paint spray booth E 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

This existing source shall apply for a Part 70 operating permit. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

TE/EVP

cc: File - Putnam County
Putnam County Health Department
Air Compliance - Marc Goldman
Permit Tracking - Janet Mobley
Air Programs Section- Michelle Boner

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

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Route 240 East, Greencastle, Indiana 46135
Exemption No.: 133-11073
Plt ID: 133-00019
Reviewer: Trish Earls
Date: June 17, 1999

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (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	
R240D	Coating Booth E	8.70	55.00%	0.00%	55.00%	0.00%	32.50%	0.0090	4.00	4.8	4.78	0.17	4.13	0.75	0.56	147.23	10.0%	
Total State Potential Emissions:												0.17	4.13	0.75	0.56			
Federal Potential Emissions (controlled):																		
										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										VOC	PM							
Total Federal Potential Emissions:										0.00%	95.00%	0.17	4.13	0.75	0.03			

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) * Transfer Efficiency
 Total = Worst Coating + Sum of all solvents used
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: HAP Emission Calculations

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Route 240 East, Greencastle, Indiana 46135
Exemption No.: 133-11073
Pit ID: 133-00019
Reviewer: Trish Earls
Date: June 17, 1999

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Ethyl Benzene Emissions (ton/yr)
R240D	Coating Booth E	8.70	0.0090	4.00	5.00%	0.07

0.07

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