May 19, 2003

Mr. Toshi Ohki
H.A. Parts Products of Indiana Company
Mailing Address
City, IN Zip Code

Re: 133-17435
Second Administrative Amendment to
Part 70 133-12660-00019

Dear Mr. Ohki:

H.A. Parts Products of Indiana Company, located at 2200 State Road 240 East, Greencastle, Indiana 46135 was issued a Part 70 permit on March 19, 2002 for a stationary plastic automotive trim molding and surface coating operations. A letter requesting a change was received on April 3, 2003, which qualifies as "revision to descriptive information where the revision will not trigger new applicable requirements". The change includes one (1) flocker, identified as FL114 and one (1) parts washer which were overlooked when the Part 70 permit was issued. No emission increase will result from the flocker, since its emission was already accounted for in the entire flocking operation's emission calculation. The parts washer was categorized as an insignificant activity. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are **bolded** and deletions are ~~struck-through~~ for emphasis):

1. Section A.2, and Section D.3 item (m) in the original Part 70 permit will be amended to include another Flocker :

   Flocking

   (~~m~~ **k**) ~~Two~~ **Three** (~~2~~ **3**) Flockers for adhesive application, identified as FL 101, FL 112,~~ both constructed in 1989~~ **and FL114. Both FL 101 and FL112** were constructed in 1989, **FL 114 was constructed in 2000**. **E**~~e~~ach utilizing an air atomization spray application system, each equipped with an infrared (IR) oven ~~with each flocker exhausting~~ **The FL 101, FL112 and FL114 Flockers** exhaust through one (1) stack, identified as F1, ~~and~~ F4 **and F6, respectively**, and each IR Oven exhausts through one (1) stack, identified F2, ~~and~~ F3, **and F5**, respectively.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(j) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

(~~m~~ **k**) ~~Two~~ **Three** (~~2~~ **3**) Flockers for adhesive application, identified as FL 101, FL 112,~~ both constructed in 1989~~ **and FL114. Both FL 101 and FL112** were constructed in 1989, **FL 114 was constructed in 2000**. **E**~~e~~ach utilizing an air atomization spray application system, **and** each equipped with an infrared (IR) oven ~~with each flocker exhausting~~ **The FL 101, FL112 and FL114 Flockers** exhaust through one (1) stack, identified as F1, ~~and~~ F4 **and F6, respectively**, and each IR Oven exhausts through one (1) stack, identified F2, ~~and~~ F3, **and F5**, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

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

(a) The total usage of VOC in the eight (8) co-extrusion lines shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, which is equivalent to less than twenty-five (25) tons of VOC emissions per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which increases emissions of VOC from the ~~two (2)~~ **three (3)** flockers to greater than 25 tons per year, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the ~~two (2)~~ **three (3)** flockers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1(a) 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.

D.3.4 VOC Emissions

Compliance with Condition D.3.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.3.5 Monitoring

(a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the ~~two (2)~~ **three (3)** flocker stacks (Stack IDs F1 ~~and~~ F4 **and F6**) while one or more of the flockers 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) Monthly inspections shall be performed of the adhesive emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these 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.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below for the eight (8) co-extrusion lines and the ~~two (2)~~ **three (3)** flockers. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(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 cleanup solvent usage for each month;

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

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

(b) To document compliance with Condition D.3.5, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.

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

2. Section A.3, Regulated insignificant Activities will be amended to include another parts washer:

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

(1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including ~~four~~ **five** (~~4~~ **5**) parts washers, identified as Tool & Die parts washer, **two (2**) Dept. 200 parts washer**s**, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

(1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including ~~four~~ **five** (~~4~~ **5**) parts washers, identified as Tool & Die parts washer, **two (2**) Dept. 200 parts washer**s**, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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 Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Putnam County
U.S. EPA, Region V
Putnam County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

H. A. Parts Products of Indiana Company
2200 State Route 240 East
Greencastle, Indiana 46135

(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.: T1331-12660-00019	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19, 2002

1st Administrative Amendment 133-15969, issued on June 18, 2002
1st Significant Permit Modification 133-16849, issued on April 10, 2003

2nd Administrative Amendment 133-17435	Pages Affected: 7, 34, 35, 36
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: May 19, 2003

Flocking

(k) Three (3) Flockers for adhesive application, identified as FL 101, FL 112, and FL114. Both FL 101 and FL112 were constructed in 1989, FL 114 was constructed in 2000. Each utilizing an air atomization spray application system, each equipped with an infrared (IR) oven. The FL 101, FL112 and FL114 Flockers exhaust through one (1) stack, identified as F1, F4 and F6, respectively, and each IR Oven exhausts through one (1) stack, identified F2, F3, and F5, respectively.

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

(1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including four (4) parts washers, identified as Tool & Die parts washer, Dept. 200 parts washer, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].

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.3 FACILITY OPERATION CONDITIONS

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

(j) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

(k) Three (3) Flockers for adhesive application, identified as FL 101, FL 112, and FL114. Both FL 101 and FL112 were constructed in 1989, FL 114 was constructed in 2000. Each utilizing an air atomization spray application system, and each equipped with an infrared (IR) oven. The FL 101, FL112 and FL114 Flockers exhaust through one (1) stack, identified as F1, F4 and F6, respectively, and each IR Oven exhausts through one (1) stack, identified F2, F3, and F5, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

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

(a) The total usage of VOC in the eight (8) co-extrusion lines shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, which is equivalent to less than twenty-five (25) tons of VOC emissions per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which increases emissions of VOC from the three (3) flockers to greater than 25 tons per year, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the three (3) flockers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1(a) 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.

D.3.4 VOC Emissions

Compliance with Condition D.3.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

D.3.5 Monitoring

(a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the three (3) flocker stacks (Stack IDs F1, F4 and F6 while one or more of the flockers 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) Monthly inspections shall be performed of the adhesive emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these 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.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below for the eight (8) co-extrusion lines and the three (3) flockers. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(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 cleanup solvent usage for each month;

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

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

(b) To document compliance with Condition D.3.5, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.

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

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:
  (1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including five parts washers, identified as Tool & Die parts washer, two (2) Dept. 200 parts washers, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Boilers

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

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 9.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Degreasing operations

Emission Limitations and Standards [326 IAC 2-7-5(1)] (Cold Cleaning Degreaser Operations)

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

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

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

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

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

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

D.4.3 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

  (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if: