



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 31, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Plasfinco, Inc / 079-19728-00019

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

August 31, 2004

Mr. Allan Miller
Plasfinco, Inc.
1060 West JFK Drive
North Vernon, Indiana 47265

Re: **079-19728-00019**
First Administrative Amendment to
FESOP 079-17990-00019

Dear Mr. Miller:

Plasfinco, Inc. was issued a permit on April 28, 2004 for a plastic and metal parts assembly and finishing operation. A letter requesting changes to this permit was received on July 13, 2004. Pursuant to the provisions of 326 IAC 2-8-10 an Administrative Amendment to this permit is hereby approved as described in the attached Technical Support Document.

Specifically, Plasfinco, Inc. has submitted an application to permit the coating of both plastic and metal parts in all eight (8) of their existing coating booths. Currently, booths 1, 2, 3, 5, 6, 7, and 8 of Unit 1 are permitted to coat plastic parts only and Unit 2 (booth 4) is permitted to coat metal parts only.

The source emission units consist of the eight (8) surface coating booths mentioned above and the following insignificant activities:

- (a) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (b) two (2) cold top degreasers with closed tops, using acetone as a solvent;
- (c) infrared cure equipment; and
- (d) paved and unpaved roads and parking lots with public access.

The proposed modification will not affect the capacity, throughput, or emissions from any of the insignificant activities. Therefore, the emissions due to the proposed modification are the emission increases due to the proposed changes to the surface coating booths. The pollutants associated with the coating booths are particulate matter (PM), PM10, volatile organic compounds (VOC), and hazardous air pollutants (HAP).

Based on the emissions estimated before and after the proposed changes, the PM, PM10, and VOC unrestricted potential to emit (UPTE) are estimated to be 2.31, 2.31, and 7.84 tons per year, which are less than the respective 326 IAC 2-8-11.1(d)(4) Minor Permit Revision Levels of 5, 5, and 10 tons per year.

In addition:

- (a) the single and combined HAP emissions are not limited to less than 10 and 25 tons per year pursuant to 326 IAC 2-8-11.1(d)(5) because the limits were established prior to the modification, and
- (b) the modification is not any of the changes listed in 326 IAC 2-8-11.1(f).

Thus, the proposed modification does not require a Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d) or a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f).



Further, there are no new applicable requirements that are triggered as a result of the modification and no existing permit requirements will be violated.

Therefore, the proposed changes shall be incorporated into the permit via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that modifications which consist of revisions of descriptive information where the revisions will not trigger a new applicable requirement or violate a permit term, may be incorporated into an existing source FESOP via an Administrative Amendment.

Pursuant to 326 IAC 2-8-10, this permit shall be revised by incorporating the administrative amendment into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the revised pages of the FESOP are provided.

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 Scott Fulton, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-233-5691, or dial 1-800-451-6027 and ask for extension 3-5691.

Sincerely,

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

Attachments

SDF

cc: File - Jennings County
U.S. EPA, Region V
Jennings County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Plasfinco, Inc.
1060 West JFK Drive
North Vernon, Indiana 47265**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 2-8 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.: F079-17990-00019	Date Issued: April 28, 2004 Expiration Date: April 28, 2009
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	

First Administrative Amendment No.: 079-19728-00019	Affected Pages: 2 - 6, 23 - 28
Issued by: Original signed by Paul Dubenetzky, Branch Chief, Office of Air Quality	August 31, 2004

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Plasfinco, Inc.
North Vernon, Indiana
Permit Reviewer: Chrystal Wagner

First Administrative Amendment No.: 079-19728-00019
Amended By: SDF

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OP No. F079-17990-00019

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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 Quality (OAQ). 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 2-8-3(b)]

The Permittee owns and operates a stationary source that assembles and finishes plastic parts and finishes metal parts.

Authorized individual: Allan Miller, Vice President Indiana Operations
Source Address: 1060 West JFK Drive, North Vernon, Indiana 47265
Mailing Address: 1060 West JFK Drive, North Vernon, Indiana 47265
General Source Phone: (812) 526-2891
SIC Code: 3089, 3471
Source Location Status: Jennings
Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of one (1) surface coating process, identified as Unit 1, consisting of eight (8) air atomized surface coating booths, identified as booths 1, 2, 3, 4, 5, 6, 7, and 8, each with a maximum capacity to coat 100 plastic parts per hour or 50 metal parts per hour with the particulate emissions from each booth controlled by dry paper filters, with all emissions exhausted through stacks 1, 2, 3, 4, 5, 6, 7, and 8, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

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

Two (2) cold top degreasers with closed tops, using acetone as a solvent;

(b) Infrared cure equipment;

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

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) surface coating process, identified as Unit 1, consisting of eight (8) air atomized surface coating booths, identified as booths 1, 2, 3, 4, 5, 6, 7, and 8, each with a maximum capacity to coat 100 plastic parts per hour or 50 metal parts per hour, with the particulate emissions from each booth controlled by dry paper filters, with all emissions exhausted through stacks 1, 2, 3, 4, 5, 6, 7, and 8, respectively.

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

D.1.1 Volatile Organic Compounds (VOC)

The use of VOC, including coatings, dilution solvents, and cleaning solvents, on coating booths 1, 2, 3, 4, 5, 6, 7, and 8 shall be limited to less than twenty-five (25) tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit will also render the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.2 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8] [326 IAC 20-1] [40 CFR 63, Subpart P] [40 CFR 63, Subpart M]

The use of all coatings and solvents, including clean-up solvents, shall be limited such that the source-wide potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of a combination of HAP shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Compliance with this limit renders 326 IAC 20-1, 326 IAC 2-7, 40 CFR 63, Subpart P (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products), and 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products), not applicable.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to T079-8388-00019, issued on June 16, 1999, and [40 CFR 52, Subpart P, the PM from the coating booths identified as 1, 2, 3, 4, 5, 6, 7, and 8 (Unit 1) 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:

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to T079-8388-00019, issued on June 16, 1999, and 326 IAC 6-3-2(d), particulate from the surface coating booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when applying surface coatings to metal parts.

D.1.6 Volatile Organic Compound (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Unit 1 during cleanup or color changes after the coating of metal parts shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, S4, S5, S6, S7, and S8) 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 Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit 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 Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from 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 2-8-4(3)] [326 IAC 2-8-16]

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 and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOC and HAP emitted for each compliance period.
- (b) To document compliance with the requirements of Condition D.1.5, the Permittee shall maintain a copy of all Material Safety Data Sheets (MSDS) and worst case as applied VOC data sheets of all coatings applied to metal parts in the surface coating booths.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) 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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Plasfinco, Inc.
North Vernon, Indiana
Permit Reviewer: Chrystal Wagner

First Administrative Amendment No.: 079-19728-00019
Amended By: SDF

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Plasfinco, Inc.
North Vernon, Indiana
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Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Plasfinco, Inc.
Source Location:	1060 West JFK Drive, North Vernon, Indiana 47265
County:	Jennings
SIC Code:	3089, 3471
Operation Permit No.:	079-17990-00019
Operation Permit Issuance Date:	April 28, 2004
Administrative Amendment No.:	079-19728-00019
Permit Reviewer:	SDF

Request

The Office of Air Quality (OAQ) has reviewed an application from Plasfinco, Inc. relating to the operation of their plastic and metal parts assembly and finishing operation.

Specifically, Plasfinco, Inc. has submitted an application to permit the coating of both plastic and metal parts in all eight (8) of their existing coating booths. Currently, booths 1, 2, 3, 5, 6, 7, and 8 of Unit 1 are permitted to coat plastic parts only and Unit 2 (booth 4) is permitted to coat metal parts only.

The source emission units consist of the eight (8) surface coating booths mentioned above and the following insignificant activities:

- (a) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (b) two (2) cold top degreasers with closed tops, using acetone as a solvent;
- (c) infrared cure equipment; and
- (d) paved and unpaved roads and parking lots with public access.

The proposed modification will not affect the capacity, throughput, or emissions from any of the insignificant activities. Therefore, the emissions due to the proposed modification are the emission increases due to the proposed changes to the surface coating booths. The pollutants associated with the coating booths are particulate matter (PM), PM₁₀, volatile organic compounds (VOC), and hazardous air pollutants (HAP).

Based on the emissions estimated before and after the proposed changes, the PM, PM₁₀, and VOC unrestricted potential to emit (UPTE) are estimated to be 2.31, 2.31, and 7.84 tons per year, which are less than the respective 326 IAC 2-8-11.1(d)(4) Minor Permit Revision Levels of 5, 5, and 10 tons per year.

In addition:

- (a) the single and combined HAP emissions are not limited to less than 10 and 25 tons per year pursuant to 326 IAC 2-8-11.1(d)(5) because the limits were established prior to the modification, and
- (b) the modification is not any of the changes listed in 326 IAC 2-8-11.1(f).

Thus, the proposed modification does not require a Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d) or a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f).

Further, there are no new applicable requirements that are triggered as a result of the modification and no existing permit requirements will be violated.

Therefore, the proposed changes shall be incorporated into the permit via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that modifications which consist of revisions of descriptive information where the revisions will not trigger a new applicable requirement or violate a permit term, may be incorporated into an existing source FESOP via an Administrative Amendment.

Existing Approvals

The source has been operating under FESOP 079-17990-00019 issued April 28, 2004.

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment 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.

Emission Calculations

As previously stated, the emissions due to the proposed modification are the increases in PM, PM10, VOC and HAP due to the proposed changes at the booths. The following calculations determine the unrestricted potential to emit (UPTE) due to the proposed changes.

Unrestricted Potential to Emit (UPTE):

The following calculations determine the increases in UPTE due to the modification based on the estimated UPTE before and after the modification.

(a) Emissions Before the Modification:

Before the modification, plastic parts are permitted to be coated in seven of the eight booths. Metal parts are permitted to be coated in the remaining booth. Therefore, the emissions before the modification are determined by summing the worst case emissions from coating plastic parts from the seven booths permitted to do so and worst case emissions from coating metal parts from the one booth permitted to do so.

PM, PM10, and VOC:

PM/PM10:	$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1 - \text{frac.volatiles}) * (1 - \text{fraction eff.}) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$	=	tons/yr
VOC:	$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{frac. organic} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$	=	tons/yr

material	part coated	lb/gal	gal/unit	unit/hr	fraction organic	fraction volatiles	fraction Eff.	PM (tons/yr)	PM10* (tons/yr)	VOC (tons/yr)
E-Kote 3063ALC	plastic	13.3	0.00146	700	0.43	0.43	0.25	25.45	25.45	25.60
E-Kote 3063FDLC	plastic	13.3	0.00146	700	0.43	0.43	0.25	25.45	25.45	25.60
Powder Gray	plastic	7.4	0.00146	700	0.82	0.82	0.25	4.47	4.47	27.16
Reducer	plastic	6.8	0.00146	700	1.00	1.00	0.25	0.00	0.00	30.44
Clear Coat	plastic	7.1	0.00146	700	0.65	0.86	0.25	3.34	3.34	20.66
Flat Black	plastic	7.2	0.00146	700	0.86	0.86	0.25	3.38	3.38	27.72
Thinner	plastic	6.6	0.00146	700	0.57	1.00	0.25	0.00	0.00	16.84
Polane Black	metal	12.9	0.00240	50	0.22	0.22	0.25	3.97	3.97	1.49
Polane White	metal	12.3	0.00240	50	0.19	0.19	0.25	3.93	3.93	1.23
Total								29.42	29.42	66.71

* PM10 is determined to be equal to PM in this case.

- (1) The E-kotes and powder gray, each, are combined with the reducer when coating plastic parts. The worst case VOC emissions from coating plastic parts under this scenario, in the seven booths permitted to do so, comes from applying powder gray and reducer (57.60 tons/yr).

The clear coat, flat black, and thinner are also combined to apply coatings to plastic parts. The VOC emissions from coating plastic parts under this scenario, in the seven booths permitted to do so, is estimated to be 65.22 tons/yr.

Polane black and polane white, each, are applied independently when coating metal parts. The worst case VOC emissions from coating metal parts at the one booth permitted to do so comes from applying polane black (1.49 tons/yr).

Therefore, the worst case VOC emissions are the sum of the worst case plastic and metal part VOC emissions, or 66.71 tons/yr (65.22 tons/yr + 1.49 tons/yr = 66.71 tons/yr).

- (2) The maximum PM(PM10) emissions from applying the E-kotes, powder gray, and reducer to plastic parts in the seven booths permitted to do so is determined to be 25.45 tons/yr (either E-kote and reducer).

The PM(PM10) emissions from applying clear coat, flat black, and thinner to plastic parts in the seven booths permitted to do so is determined to be 6.72 tons/yr.

The maximum PM(PM10) emissions from applying polane black or polane white to metal parts in the one booth permitted to do so is determined to be 3.97 tons/yr (polane black).

Therefore, the worst case PM(PM10) emissions are the sum of the worst case plastic and metal part PM(PM10) emissions, or 29.42 tons/yr (25.45 tons/yr + 3.97 tons/yr = 29.42 tons/yr).

HAP:

$$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{frac. HAP} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	6063ALC	6063FDLC	Gray	Reducer	Clear Coat	Flat Black	Thinner	Polane Black	Polane White
lb/gal	13.3	13.3	7.4	6.8	7.1	7.2	6.6	12.9	12.3
gal/unit	0.00146	0.00146	0.00146	0.00146	0.00146	0.00146	0.00146	0.0024	0.0024
unit/hr	700	700	700	700	700	700	700	50	50
fraction Ni	0.46	0.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00
fraction toluene	0.31	0.00	0.00	0.00	0.10	0.22	0.00	0.02	0.01
fraction methanol	0.00	0.21	0.00	0.37	0.00	0.0002	0.00	0.00	0.00
fraction MEK	0.00	0.00	0.00	0.00	0.43	0.30	0.00	0.00	0.00
fraction MIK	0.00	0.00	0.00	0.00	0.12	0.10	0.00	0.00	0.00
fraction xylene	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.02	0.02
fraction Hexane	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00
fraction Pb	0.00	0.00	0.0074	0.00	0.00	0.00	0.00	0.00	0.00
Fraction Cr	0.00	0.00	0.0025	0.00	0.00	0.00	0.00	0.00	0.00
fraction 2-nitropropane	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00
glycol ethers	0.00	0.22	0.00	0.00	0.00	0.003	0.00	0.00	0.00

	6063ALC	6063FDLC	Gray	Reducer	Clear Coat	Flat Black	Thinner	Polane Black	Polane White	Total (t/y)
Ni (t/y)	27.39	27.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.98
toluene (t/y)	18.46	0.00	0.00	0.00	3.18	7.09	0.00	0.14	0.06	18.60
methanol (t/y)	0.00	12.50	0.00	11.26	0.00	0.01	0.00	0.00	0.00	23.76
MEK (t/y)	0.00	0.00	0.00	0.00	13.67	9.67	0.00	0.00	0.00	23.34
MIK (t/y)	0.00	0.00	0.00	0.00	3.81	3.22	0.00	0.00	0.00	7.03
xylene (t/y)	0.00	0.00	0.00	0.00	0.00	1.29	0.00	0.14	0.13	1.43
hexane t/y)	0.00	0.00	0.00	0.00	0.00	0.00	2.95	0.00	0.00	2.95
Pb (t/y)	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25
Cr (t/y)	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.08
2-nitropropane (t/y)	0.00	13.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.10
glycol ethers (t/y)	0.00	13.10	0.00	0.00	0.00	0.10	0.00	0.00	0.00	13.10
									Total	131.62

- (1) The worst case individual HAP emissions from coating plastic parts is determined by evaluating the individual HAP emissions generated by each coating combination (E-kotes or powder gray with reducer and clear coat, flat black, and thinner).
- (2) The worst case individual HAP emissions from coating metal parts is determined by evaluating the individual HAP emissions generated by applying polane black or polane white.

- (3) The total worst case individual HAP emissions are determined by summing the worst case plastic and worst case metal individual HAP estimates.
- (4) The combined HAP emissions are determined by summing the estimated total worst case individual HAP estimates.

(b) Emissions After the Modification:

After the modification, plastic or metal parts can be coated in any of the eight booths. Therefore, the emissions after the modification are estimated by determining the emissions for each combination for both metal and plastic parts based on the combined maximum number of parts that can be coated if all eight booths were used at the same time and then determining the single worst case combination for each pollutant.

PM, PM10, and VOC:

PM/PM10: $\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1 - \text{frac.volatiles}) * (1 - \text{fraction eff.}) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$
 VOC: $\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{frac. organic} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$

material	part coated	lb/gal	gal/unit	unit/hr	fraction organic	fraction volatiles	fraction Eff.	PM (tons/yr)	PM10* (tons/yr)	VOC (tons/yr)
E-Kote 3063ALC	plastic	13.3	0.00146	800	0.43	0.43	0.25	29.09	29.09	29.26
E-Kote 3063FDLC	plastic	13.3	0.00146	800	0.43	0.43	0.25	29.09	29.09	29.26
Powder Gray	plastic	7.4	0.00146	800	0.82	0.82	0.25	5.11	5.11	31.04
Reducer	plastic	6.8	0.00146	800	1.00	1.00	0.25	0.00	0.00	34.79
Clear Coat	plastic	7.1	0.00146	800	0.65	0.86	0.25	3.81	3.81	23.61
Flat Black	plastic	7.2	0.00146	800	0.86	0.86	0.25	3.87	3.87	31.68
Thinner	plastic	6.6	0.00146	800	0.57	1.00	0.25	0.00	0.00	19.25
Polane Black	metal	12.9	0.00240	400	0.22	0.22	0.25	31.73	31.73	11.93
Polane White	metal	12.3	0.00240	400	0.19	0.19	0.25	31.42	31.42	9.83
Total								31.73	31.73	74.54

* PM10 is determined to be equal to PM in this case.

- (1) The E-kotes, and powder gray, each, are combined with the reducer when coating plastic parts. The worst case VOC emissions from coating plastic parts under these combinations at all eight booths comes from applying powder gray and reducer (65.83 tons/yr).

The clear coat, flat black, and thinner are also combined to apply coatings to plastic parts. The VOC emissions from coating plastic parts under this scenario at all eight booths is estimated to be 74.54 tons/yr.

Polane black and polane white, each, are applied independently when coating metal parts. The worst case VOC emissions from coating metal parts at all eight booths comes from applying polane black (11.93 tons/yr).

Therefore, the worst case VOC emissions come from applying clear coat, flat black, and thinner to plastic parts (74.54 tons VOC/yr).

(2) The worst case PM(PM10) emissions from applying the E-kotes, powder gray, and reducer to plastic parts in all eight booths is determined to be 29.09 tons/yr (either E-kote and reducer).

The PM(PM10) emissions from applying clear coat, flat black, and thinner to plastic parts in all eight booths is determined to be 7.68 tons/yr.

The worst case PM(PM10) emissions from applying polane black or polane white to metal parts in all eight booths is determined to be 31.73 tons/yr (polane black).

Therefore, the worst case PM(PM10) emissions come from applying polane black (31.73 tons/yr).

HAP:

$$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{frac. HAP} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	6063ALC	6063FDLC	Gray	Reducer	Clear Coat	Flat Black	Thinner	Polane Black	Polane White
lb/gal	13.3	13.3	7.4	6.8	7.1	7.2	6.6	12.9	12.3
gal/unit	0.00146	0.00146	0.00146	0.00146	0.00146	0.00146	0.00146	0.0024	0.0024
unit/hr	800	800	800	800	800	800	800	400	400
fraction Ni	0.46	0.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00
fraction toluene	0.31	0.00	0.00	0.00	0.10	0.22	0.00	0.02	0.01
fraction methanol	0.00	0.21	0.00	0.37	0.00	0.0002	0.00	0.00	0.00
fraction MEK	0.00	0.00	0.00	0.00	0.43	0.30	0.00	0.00	0.00
fraction MIK	0.00	0.00	0.00	0.00	0.12	0.10	0.00	0.00	0.00
fraction xylene	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.02	0.02
fraction Hexane	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00
fraction Pb	0.00	0.00	0.0074	0.00	0.00	0.00	0.00	0.00	0.00
Fraction Cr	0.00	0.00	0.0025	0.00	0.00	0.00	0.00	0.00	0.00
fraction 2-nitropropane	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00
glycol ethers	0.00	0.22	0.00	0.00	0.00	0.003	0.00	0.00	0.00

	6063ALC	6063FDLC	Gray	Reducer	Clear Coat	Flat Black	Thinner	Polane Black	Polane White	Total (t/y)
Ni (t/y)	31.30	31.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31.98
toluene (t/y)	21.09	0.00	0.00	0.00	3.63	8.10	0.00	1.08	0.52	21.09
methanol (t/y)	0.00	14.29	0.00	12.87	0.00	0.01	0.00	0.00	0.00	27.16
MEK (t/y)	0.00	0.00	0.00	0.00	15.61	11.05	0.00	0.00	0.00	26.66
MIK (t/y)	0.00	0.00	0.00	0.00	4.36	3.68	0.00	0.00	0.00	8.04
xylene (t/y)	0.00	0.00	0.00	0.00	0.00	1.47	0.00	1.08	1.03	1.47
hexane t/y)	0.00	0.00	0.00	0.00	0.00	0.00	3.38	0.00	0.00	3.38
Pb (t/y)	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.28
Cr (t/y)	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.09
2-nitropropane (t/y)	0.00	14.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14.97
glycol ethers (t/y)	0.00	14.97	0.00	0.00	0.00	0.11	0.00	0.00	0.00	14.97
Total										150.09

- (1) The worst case individual HAP emissions from coating plastic parts is determined by evaluating the individual HAP emissions generated by each coating combination (E-kotes with reducer and clear coat, flat black, and thinner).
- (2) The worst case individual HAP emissions from coating metal parts is determined by evaluating the individual HAP emissions generated by applying polane black or polane white.
- (3) The total worst case individual HAP emissions are determined by determining which is greater, the worst case plastic combination or the worst case metal combination.
- (4) The combined HAP emissions are determined by summing the estimated total worst case individual HAP emission estimates.

(c) UPTE Due to the Modification:

The UPTE due to the modification is determined by subtracting the estimated emissions before controls from the estimated emissions after controls.

$$\text{UPTE Due to the Modification (tons/yr)} = \text{UPTE After the Mod. (tons/yr)} - \text{UPTE Before the Mod. (tons/yr)}$$

	PM (tons/yr)	PM10 (tons/yr)	VOC (tons/yr)	Single HAP (tons/yr)	Combined HAP (tons/yr)
After Mod.	31.73	31.73	74.54	31.98 (Ni)	150.09
Before Mod.	29.42	29.42	66.71	27.98 (Ni)	131.62
Total	2.31	2.31	7.83	4.00	18.47

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.31
PM-10	2.31
SO ₂	-
VOC	7.83
CO	-
NO _x	-

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

Pollutant	Potential To Emit (tons/year)
Total Combined HAPs	18.47

The PM, PM10, and VOC unrestricted potential to emit (UPTE) are less than the respective 326 IAC 2-8-11.1(d)(4) Minor Permit Revision Levels of 5, 5, and 10 tons per year.

In addition:

- (a) the single and combined HAP emissions are not limited to less than 10 and 25 tons per year pursuant to 326 IAC 2-8-11.1(d)(5) because the limits were established prior to the modification, and
- (b) the modification is not any of the changes listed in 326 IAC 2-8-11.1(f).

Thus, the proposed modification does not require a Minor Permit Revision pursuant to 326 IAC 2-8-11.1(d) or a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f).

Further, there are no new applicable requirements that are triggered as a result of the modification and no existing permit requirements will be violated.

Therefore, the proposed changes shall be incorporated into the permit via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that modifications which consist of revisions of descriptive information where the revisions will not trigger a new applicable requirement or violate a permit term, may be incorporated into an existing source FESOP via an Administrative Amendment.

County Attainment Status

The source is located in Jennings County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (b) Jennings 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.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Existing 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) as obtained from the Technical Support Document (TSD) of FESOP 079-17990-00019, issued on April 28, 2004:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Existing Source	1.50	1.50	-	-	26.50	-	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This existing source is not a major PSD 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) This existing source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Potential to Emit (PTE) After the Proposed Modification

Source emissions after the modification after application of all limits and controls.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
After the Modification	1.61	1.61	-	-	<25	-	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The particulate emissions are controlled by dry filters. The PM and PM10 emissions after controls are estimated to be 1.61 and 1.61 tons/yr.
- (b) The VOC emissions from booths 1, 2, 3, 5, 6, 7, and 8, are currently limited in the existing source FESOP to less than 25 tons/yr to avoid the requirements of 326 IAC 8-1-6. Booth 4 is not currently limited in the existing source FESOP because the source unrestricted potential VOC emissions are less than the Part 70 level of 100 tons per year.

Since all eight booths will be permitted to coat both metal and plastic parts, the requirements of 326 IAC 8-1-6 will apply some of the time and the requirements of 326 IAC 8-2-9 will apply at other times. In order to avoid the record keeping problems that would occur with trying to demonstrate and document compliance, Plasfinco has proposed accepting a voluntary VOC limit of less than 25 tons per year for all eight booths at all times.

Accepting the VOC limit will render the 326 IAC 8-1-6 requirements not applicable and reduce the VOC emissions from all eight coating booths to less than 25 tons/yr.

No source VOC limit is required because the source unrestricted potential VOC emissions are still less than the Part 70 level of 100 tons per year.

- (c) The source single and combined HAP emissions will still be limited to less than 10 and 25 tons per year, respectively, to avoid the 326 IAC 2-7 Part 70 requirements and the requirements of 40 CFR 63, Subparts Mmmm and Pppp.
- (d) The source after the proposed modification is still not a major PSD 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.
- (e) The source after the proposed modification is still not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Federal Rule Applicability

- (a) This source is still not subject to the requirements of 40 CFR 60, Subpart TTT because the source SIC codes are still not any of the applicable SIC code categories.

- (b) The surface coating booths are not subject to the requirements of 40 CFR 63, Subpart PPPP because the source is still a minor source for HAPs (the single and combined HAPs are limited to less than 10 and 25 tons per year).
- (c) The surface coating booths are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart M (Miscellaneous Metal Parts and Products Surface Coating) because the source is still a minor source for HAPs.
- (d) The surface coating lines will still have no applicable 40 CFR 64 compliance assurance monitoring (CAM) requirements pursuant to 40 CFR 64.1 because the uncontrolled PTE for particulate matter and VOC will still be less than the applicable level of 100 tons per year.
- (e) The two (2) degreasing units are still not subject to the requirements of the 40 CFR 63, Subpart T because the solvent used is still not one of the solvents described in the applicability section.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements):

The source is still not a major PSD 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) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)):

This source is still not subject to the requirements of 326 IAC 2-4.1 because the source single and combined HAP emissions are still limited to less than their respective applicable levels of 10 and 25 tons per year.

- (c) 326 IAC 5-1 (Opacity Limitations)

The requirements of 326 IAC 5-1 still apply. The proposed changes will not affect the current requirements.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 6-3-2 (40 CFR 52, Subpart P):

326 IAC 6-3 still applies to the affected facilities. The proposed changes will not affect the current requirements.

- (b) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements):

The requirements of 326 IAC 8-1-6 would apply when plastic parts are coated in booths 1, 2, 3, 4, 5, 6, 7, and 8. 326 IAC 8-1-6 does not apply when metal parts are coated in booths 1, 2, 3, 4, 5, 6, 7, and 8 because the requirements of 326 IAC 8-2-9 apply when metal parts are coated in the booths.

Since all eight booths will be permitted to coat both metal and plastic parts, the requirements of 326 IAC 8-1-6 will apply some of the time and the requirements of 326 IAC 8-2-9 will apply at other times. In order to avoid the record keeping problems that would occur with trying to demonstrate and document compliance, Plasfinco has proposed accepting a voluntary VOC limit of less than 25 tons per year for all eight booths at all times.

Accepting the VOC limit will render the 326 IAC 8-1-6 requirements not applicable.

(c) 326 IAC 8-2-9 (Miscellaneous Metal Coating):

Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of the coating delivered to the applicators of booths 1 - 8 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings, when applying coatings to the metal parts.

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.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

(d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)

326 IAC 8-3 still does not apply to the two (2) cold top degreasers, because the solvent used, acetone, is still not considered a VOC pursuant to 326 IAC 1-2-48.

Changes to the Permit

To incorporate the proposed modification into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

(a) Condition A.2:

The unit description of Condition A.2 shall be changed as follows to state that both metal and plastic parts can be coated at all eight of the surface coating booths.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) ~~Seven one (1) surface coating process, identified as Unit 1, consisting of eight (78) air atomized surface coating booths, identified as Unit 1, identified as which consists of the following booths 1, 2, 3, 4, 5, 6, 7, and 8, each with a maximum capacity to coat 100 plastic parts per hour or 50 metal parts per hour maximum number of units per hour per booth is 100, coating plastic, type of application method used is air atomization, with the particulate emissions from each booth controlled by using dry paper filters as control, with all emissions exhausted through stacks 1, 2, 3, 4, 5, 6, 7, and 8, respectively.~~
One (1) surface coating process, identified as Unit 1, consisting of eight (78) air atomized surface coating booths, identified as Unit 1, identified as which consists of the following booths 1, 2, 3, 4, 5, 6, 7, and 8, each with a maximum capacity to coat 100 plastic parts per hour or 50 metal parts per hour maximum number of units per hour per booth is 100, coating plastic, type of application method used is air atomization, with the particulate emissions from each booth controlled by using dry paper filters as control, with all emissions exhausted through stacks 1, 2, 3, 4, 5, 6, 7, and 8, respectively.
- (b) ~~One (1) surface coating booth, identified as Unit 2 which consists of the following booth SPB4, maximum number of units per hour per booth is 50, coating metal, type of application method used is air atomization, using dry paper filters as control exhausting to stack 4.~~
One (1) surface coating booth, identified as Unit 2 which consists of the following booth SPB4, maximum number of units per hour per booth is 50, coating metal, type of application method used is air atomization, using dry paper filters as control exhausting to stack 4.

(b) Section D.2:

Section D.2 shall be removed and all applicable conditions moved to Section D.1 because booth 4, which was placed in its own "D" section (Section D.2) because it was only permitted to apply metal coatings (Section D.1 applies to the booths that are permitted to coat plastic parts only), is now, along with the booths listed in Section D.1, permitted to coat both metal and plastic parts. Since both metal and plastic parts can be coated in the booths, booth 4 can be introduced into Section D.1, rendering Section D.2 not necessary.

The 326 IAC 8-2-9 metal coating requirements of Conditions D.2.1 and D.2.2 shall be modified to apply to all eight booths when coating metal parts and incorporated into Section D.1.

The metal surface coating requirements of Condition D.2.3 shall be incorporated into Condition D.1.2 because both conditions D.1.2 and D.2.3 limit the single and combined HAP emissions to less than the major source levels to render, as applicable, the metal and plastic coating requirements of 40 CFR 63, Subparts M MMM and P PPP, not applicable.

All of the other requirements of Section D.2 apply to booth 4 and the booths listed in Section D.1. Therefore, these remaining conditions shall be removed from Section D.2 and their corresponding Section D.1 conditions shall be modified to apply to all eight booths.

(c) Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to include booth 4 and state that both metal and plastic parts can be coated at the surface coating booths.

Facility Description [326 IAC 2-8-4(10)]:

Seven one (1) surface coating process, identified as Unit 1, consisting of eight (78) air atomized surface coating booths, identified as Unit 1, identified as which consists of the following booths 1, 2, 3, 4, 5, 6, 7, and 8, each with a maximum capacity to coat 100 plastic parts per hour or 50 metal parts per hour, maximum number of units per hour per booth is 100, coating plastic, type of application method used is air atomization, with the particulate emissions from each booth controlled by using dry paper filters as control, with all emissions exhausted through stacks 1, 2, 3, 4, 5, 6, 7, and 8, respectively.

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

(d) Condition D.1.1:

Condition D.1.1 shall be revised as follows to reflect the fact that the limit applies to all eight booths and that the limit is voluntary, not pursuant to 326 IAC 8-1-6.

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

~~Pursuant to T079-8388-00019, issued on June 16, 1999, The use of VOC, including coatings, dilution solvents, and cleaning solvents, on coating booths identified as 1, 2, 3, 4, 5, 6, 7, and 8 (Unit 1) shall be limited to less than twenty-five (25) tons per 12 consecutive month period with compliance determined at the end of each month.~~

~~This usage limit is required to limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit will also render makes the Best Available Control Technology (BACT) requirements in of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.~~

(e) Condition D.1.2:

Since all eight booths can coat metal and plastic parts, the 40 CFR 63, Subpart PPPP plastic coating requirements of Condition D.1.2 shall be modified as follows to reflect that fact that the single and combined HAP limits are established to render the plastic parts coating requirements of Subpart PPPP and the metal parts coating requirements of Subpart MMMM not applicable.

D.1.2 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-8] [326 IAC 20-1] [40 CFR 63, Subpart PPPP] **[40 CFR 63, Subpart MMMM]**

The use of all coatings and solvents, including clean-up solvents, shall be limited such that the source-wide potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of a combination of HAP shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Compliance with this limit ~~in combination with Condition D.2.3~~ renders 326 IAC 20-1, 326 IAC 2-7, ~~and~~ 40 CFR 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products), **and 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products)**, not applicable.

(f) Condition D.1.3:

Condition D.1.3 shall be revised as follows to include booth 4.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to T079-8388-00019, issued on June 16, 1999, and [40 CFR 52, Subpart P, the PM from the coating booths identified as 1, 2, 3, **4**, 5, 6, 7, and 8 (Unit 1) shall not exceed the pound per hour emission rate established as E in the following formula:

.....

(g) Condition D.1.4:

Condition D.1.4 shall be changed as follows to include the term "booths".

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to T079-8388-00019, issued on June 16, 1999, and 326 IAC 6-3-2(d), particulate from the surface coating **booths** shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(h) New Conditions D.1.5 and D.1.6:

New Conditions D.1.5 and D.1.6 shall be added to include the 326 IAC 8-2-9 metal coating requirements which were established in Section D.2. These conditions shall be revised to apply to all eight booths and Condition D.1.5 shall be revised to identify the limit only once.

D.1.5 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) ~~three and five-tenths (3.5)~~ pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when applying surface coatings to metal parts.

D.1.6 Volatile Organic Compound (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]
Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Unit 1 during cleanup or color changes after the coating of metal parts shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

All subsequent conditions shall be renumbered accordingly.

(h) Condition D.1.6:

Condition D.1.6 (now Condition D.1.8) shall be revised as follows to include the content limit of new Condition D.1.5.

D.1.68 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(i) Condition D.1.7:

Condition D.1.7 (now Condition D.1.9) shall be revised as follows to include booth 4.

D.1.79 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, ~~S4~~, S5, S6, S7, and S8) 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 Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

.....

(j) Condition D.1.8:

Condition D.1.8 (now Condition D.1.10) shall be changed as follows to include a requirement to maintain copies of the metal coating MSDS and worst case as applied VOC data sheets so that compliance with the content limits of Condition D.1.5 can be documented.

.....

(b) To document compliance with the requirements of Condition D.1.5, the Permittee shall maintain a copy of all Material Safety Data Sheets (MSDS) and worst case as applied VOC data sheets of all coatings applied to metal parts in the surface coating booths.

~~(bc)~~ To document compliance with Condition D.1.79, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

(k) Table of Contents:

The Table of Contents shall be revised to reflect the changes to the conditions that have been made and to remove the Section D.2 references.

Conclusion

The Permittee shall operate booths 1 - 8 according to the requirements specified in First Administrative Amendment 079-19728-00019 and all other existing valid approvals.