INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: February 11, 2005

RE: H.A. Parts Products of Indiana Company / 133-20067-00019

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

## Notice of Decision: Approval - Effective Immediately

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 IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of 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-MOD.dot 1/10/05

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February 11, 2005

Mr. Bill Emanuel
H. A. Parts Products of Indiana Company
2200 SR 240 East
Greencastle, Indiana 46135

Re: 133-20067
Minor Source Modification to
Part 70 Permit No.: T133-12660-00019

Dear Mr. Emanuel:

H. A. Parts Products of Indiana Company was issued a Part 70 operation permit T133-12660-00019 on March 19, 2002 for a stationary plastic automotive trim molding and surface coating source located at 2200 SR 240 East, Greencastle, Indiana 46135. An application to modify the source was received by the Office of Air Quality (OAQ) on December 28, 2004. The modification includes replacement of several pieces of equipment with new equipment (Booth A, Booth D, Booth E, Mask Washer #1, and Co-Extrusion Line CX-108 are replaced with PT537, PT538, PT539, Mask Washer A, and Co-Extrusion Line CX115), construction of one new emission unit (Flocker FL116). The source also requested that the permit be modified though a Minor Permit Modification to include the renaming of several process areas, emission units, emission units IDs, and stack IDs. Pursuant to 326 IAC 2-7-10.5(d)(4)(B), the following emission units are approved for construction at the source:

(a) one (1) paint spray booth, identified as PT537, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as 537-P-1, 537-P-2, 537-O-1;

(b) one (1) paint spray booth, identified as PT538, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 538-P-1, 538-P-2, 538-P-3, 538-O-1;

(c) one (1) paint spray booth, identified as PT539, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 539-P-1, 539-P-2, 539-P-3, 539-O-1;

(d) one (1) Mask washer, identified as Mask Washer A, constructed in 2003, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as PMR-A-1;

(e) one (1) co-extrusion line, identified as CX115, constructed in 2004, utilizing a roller coating system for adhesive application, exhausting through stack E4;

(f) one (1) flocker for adhesive application, identified as FL116, constructed in 2004, utilizing a roll coating application system, exhausting through stack F6.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

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 Nathan Bell, at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
NCB

cc: File - Putnam County
Putnam County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section
Administrative and Development

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# PART 70 MINOR SOURCE MODIFICATION
# OFFICE OF AIR QUALITY

## H. A. Parts Products of Indiana Company
## 2200 SR 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.

| First Minor Permit Modification No: 133-20067-00019 | |
|---|---|
| Issued by:Original signed by<br>Paul Dubenetzky, Chief<br>Permit Branch<br>Office of Air Quality | Issuance Date:February 11, 2005 |

## SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary plastic automotive trim molding and surface coating operation.

| | |
|---|---|
| Responsible Official: | Toshi Ohki, President |
| Source Address: | 2200 State Road 240 East, Greencastle, IN 46135 |
| Mailing Address: | P.O. Box 157, Greencastle, Indiana 46135 |
| General Source Phone Number: | 765-653-2000 |
| SIC Code: | 3089, 3465 |
| County Location: | Putnam |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Minor Source, under PSD Rules;<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

Hand Paint Spray Booths

(a) one (1) paint spray booth, identified as PT537, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as 537-P-1, 537-P-2, 537-O-1;

(b) one (1) paint spray booth, identified as PT538, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 538-P-1, 538-P-2, 538-P-3, 538-O-1;

(c) one (1) paint spray booth, identified as PT539, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 539-P-1, 539-P-2, 539-P-3, 539-O-1;

North Paint Mix Room

(d) one (1) Mask washer, identified as Mask Washer A, constructed in 2003, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as PMR-A-1;

Co-Extrusion

(e) one (1) co-extrusion line, identified as CX115, constructed in 2004, utilizing a roller

coating system for adhesive application, exhausting through stack E4;

Flocking

(f) one (1) flocker for adhesive application, identified as FL116, constructed in 2004, utilizing a roll coating application system, exhausting through stack F6.

A.3 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 Description [326 IAC 2-7-5(15)]:**
Hand Paint Spray Booths

(a) one (1) paint spray booth, identified as PT537, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as 537-P-1, 537-P-2, 537-O-1;

(b) one (1) paint spray booth, identified as PT538, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 538-P-1, 538-P-2, 538-P-3, 538-O-1;

(c) one (1) paint spray booth, identified as PT539, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 539-P-1, 539-P-2, 539-P-3, 539-O-1;

North Paint Mix Room

(d) one (1) Mask washer, identified as Mask Washer A, constructed in 2003, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as PMR-A-1;

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

Pursuant to CP-133-5802-00019, issued October 7, 1996, the best available control technology (BACT) for the spray coating of plastic automobile trim in PT537, PT538, and PT539 shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators in PT537, PT538, and PT539 shall not exceed 34.2 tons per twelve (12) consecutive month period. This usage limit is equivalent to 34.2 tons of VOC per twelve (12) consecutive month period.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the hand paint spray booths, identified as PT537, PT538, and PT539 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

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each surface coating facility shall be controlled by a closed loop internal mix / waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for Mask Washer A, a cold cleaning operation 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.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other

additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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.1.9 VOC Emissions

Compliance with Condition D.1.1 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.1.10 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs 537-P-1, 537-P-2, 537-O-1, 538-P-1, 538-P-2, 538-P-3, 538-O-1, 539-P-1, 539-P-2, 539-P-3, and 539-O-1) 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 violation of this permit.

(b) Monthly 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 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.

During periods of inclement weather, the Permittee may perform the required visible emissions notations from the ground, observing and noting whether or not there are visible emissions exhausted from the stack(s) and if there is any overspray accumulation

on the ground.

Upon determination that the weather has improved sufficiently to allow safe inspection of the rooftops, the Permittee shall inspect and note whether or not there is overspray accumulation on the rooftops.

If the Permittee performs the visible emissions notations during periods of inclement weather, the Permittee shall include in the required records, a statement that visible emissions were observed from the ground where the stack itself was not clearly visible, a description of the type of inclement weather which prevented viewing the stack from the rooftops, and the date the rooftops were observed.

(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.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, 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 usage limits and/or the VOC emission limits established in Condition D.1.1.

(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.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly 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.1.12 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.13 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.1.14 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 Aresponsible official@ as defined by 326 IAC 2-7-1(34).

**SECTION D.3 FACILITY OPERATION CONDITIONS**

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

(e) one (1) co-extrusion line, identified as CX115, constructed in 2004, utilizing a roller coating system for adhesive application, exhausting through stack E4;

Flocking

(f) one (1) flocker for adhesive application, identified as FL116, constructed in 2004, utilizing a roll coating application system, exhausting through stack F6.

(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 flocker FL116 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) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from flocker FL116 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

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.3.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

**Compliance Determination Requirements**

D.3.5 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.3.6 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.3.7 Monitoring

(a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from flocker FL116 stack F5 while flocker FL116 is 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.3.8 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 co-extrusion line CX115 and flocker FL116. 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.3.7, 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.3.9 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11)

and in 40 CFR 63.9(h).

D.3.10 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.3.11 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.3.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.3.13 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).

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

## Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: PT537, PT538, and PT539
Parameter: VOC usage
Limit: The total amount of volatile organic compounds (VOC) delivered to the applicators shall not exceed 34.2 tons per twelve (12) consecutive month period.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

| | |
|---|---|
| Source Name: | H.A. Parts Products of Indiana Company |
| Source Address: | 2200 State Road 240 East, Greencastle, Indiana 46135 |
| Mailing Address: | P.O. Box 157, Greencastle, Indiana 46135 |
| 1st Significant Permit Modification: | 133-16849 |
| Part 70 Permit No.: | T133-12660-00019 |
| Facility: | Mask Washer A |
| Parameter: | VOC and HAP usages |
| Limit: | Pursuant to Agreed Order Case No. 2000-9022-A, VOC or HAP usages shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month. |

QUARTER: _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | VOC and HAP Usage This Month (tons) | VOC and HAP Usage Previous 11 Months (tons) | 12 Month Total VOC and HAP Usage (tons) |
| 1st Month | | | |
| 2nd Month | | | |
| 3rd Month | | | |

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position:_____

Signature: _____

Date: _____

Phone:_____

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **H. A. Parts Products of Indiana Company** |
| **Source Location:** | **2200 SR 240 East, Greencastle, IN 46135** |
| **County:** | **Putnam** |
| **SIC Code:** | **3089** |
| **Operation Permit No.:** | **T133-12660-00019** |
| **Operation Permit Issuance Date:** | **March 19, 2002** |
| **Minor Source Modification No.:** | **133-20067-00019** |
| **Minor Permit Modification No.:** | **133-20411-00019** |
| **Permit Reviewer:** | **Nathan C. Bell** |

The Office of Air Quality (OAQ) has reviewed a modification application from H. A. Parts Products of Indiana Company relating their existing stationary plastic automotive trim molding and surface coating source. The application included various source modifications that were completed in 2001, 2003, and 2004. The source has replaced several pieces of equipment with new equipment (Booth A, Booth D, Booth E, Mask Washer #1, and Co-Extrusion Line CX-108 were replaced with PT537, PT538, PT539, Mask Washer A, and Co-Extrusion Line CX115, respectively) and has constructed one new emission unit (Flocker FL116).

The source also constructed two (2) new parts washers, using electrically heated water to clean parts prior to the painting operation, that do not emit any regulated criteria pollutants or hazardous air pollutants. These two part washers do not need to be permitted.

Finally, the source requested that several process areas, emission units, emission units IDs, and stack IDs be renamed (See “Changes to the Part 70 Permit Due to This Modification”).

The source modification includes construction and operation of the follow emission units and pollution control devices:

**Unpermitted Emission Units and Pollution Control Equipment**

(a) one (1) paint spray booth, identified as PT537, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as 537-P-1, 537-P-2, 537-O-1;

(b) one (1) paint spray booth, identified as PT538, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 538-P-1, 538-P-2, 538-P-3, 538-O-1;

(c) one (1) paint spray booth, identified as PT539, constructed in 2001, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through four (4) stacks, identified as 539-P-1, 539-P-2, 539-P-3, 539-O-1;

(d) one (1) Mask washer, identified as Mask Washer A, constructed in 2003, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as PMR-A-1;

(e) one (1) co-extrusion line, identified as CX115, constructed in 2004, utilizing a roller coating system for adhesive application, exhausting through stack E4;

(f) one (1) flocker for adhesive application, identified as FL116, constructed in 2004, utilizing a roll coating application system, exhausting through stack F6.

**History**

H. A. Parts Products of Indiana Company was issued a Part 70 operation permit T133-12660-00019 on March 19, 2002 for a stationary plastic automotive trim molding and surface coating source. An application to modify the source was received by the Office of Air Quality (OAQ) on December 28, 2004. The application included various source modifications and permit modifications as described above.

Based on the information provided in the application and additional information received on January 13, 2005 and January 21, 2005, the source stated that the new emission units (PT537, PT538, PT539, Mask Washer A, and Co-Extrusion Line CX115) are of the same type and capacity as the units they are replacing (Booth A, Booth D, Booth E, Mask Washer #1, and Co-Extrusion Line CX-108), will comply with same applicable requirements and permit terms and conditions as the units they are replacing, and will not change the potential to emit regulated criteria pollutants or hazardous air pollutants (as compared to pre-modification).

The source also stated that the new emission unit Flocker FL116 is of the same type as the other three (3) existing flockers, will comply with same applicable requirements and permit terms and conditions as the existing flockers, and will not change total combined potential usage of flocking material (4.25 pounds per hour) at the source. However, for this TSD, it is assumed that FL116 will increase “potential” emissions of regulated criteria pollutants and hazardous air pollutants from the four (4) flockers combined by 133%.

**Existing Approvals**

The source was issued a Part 70 Operating Permit T133-12660-00019 on March 19, 2002. The source has since received the following:

(a) First Administrative Amendment No.: 133-15969, issued on June 18, 2002;

(b) First Significant Permit Modification No.: 133-16849, issued on April 10, 2003;

(c) Second Administrative Amendment No.: 133-17435, issued on May 19, 2003; and

(d) Second Significant Permit Modification No.: 133-18041, issued on December 15, 2003.

**Enforcement Issue**

(a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the heading Unpermitted Emission Units and Pollution Control Equipment.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**Recommendation**

The staff recommends to the Commissioner that the Minor Source Modification and the Minor Permit Modification, be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional

information submitted by the applicant.

An application for the purposes of this review was received on December 28, 2004. Additional information was received on January 13, 2005 and January 21, 2005.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 to 5).

**Potential To Emit Before Controls (Modification)**

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

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) | | |
|---|---|---|---|
| | Replacement Units (PT537, PT538, PT539, Mask Washer A, CX115) | New Unit FL116 | Total |
| PM | 16.88 | 1.12 | 18.0 |
| PM-10 | 16.88 | 1.12 | 18.0 |
| SO2 | 0 | 0 | 0 |
| NOx | 0 | 0 | 0 |
| VOC | 55.24 | 4.96 | 60.2 |
| CO | 0 | 0 | 0 |
| Xylene | 1.6 | | 1.6 |
| Ethyl Benzene | 0.87 | | 0.87 |
| MEK | 0.95 | | 0.95 |
| Toluene | 25.7 | 0.06 | 25.8 |
| Isopropyl Benzene | 0.014 | | 0.014 |
| Methanol | 0.002 | | 0.002 |
| Glycol Ethers | 0.3 | | 0.30 |
| MEK | 2.37 | 0.23 | 2.6 |
| MIBK | 0 | 3.0 | 3.0 |
| Methyl Methacrylate | 0.007 | | 0.007 |
| Formaldehyde | 0.001 | | 0.001 |
| TOTAL HAPs | 31.81 | 3.29 | 35.2 |

**Justification for Modification**

The Part 70 operating permit is being modified through both a Part 70 Minor Source Modification and Minor Permit Modification. These modifications are being performed based on the following justification:

(a) The replacement modification (Booth A, Booth D, Booth E, Mask Washer #1, and Co-Extrusion Line CX-108 were replaced with PT537, PT538, PT539, Mask Washer A, and Co-Extrusion Line CX115, respectively) has a potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) greater than the thresholds under 326 IAC 2-7-10.5(d)(3), but less than the significant levels in 326 IAC 2-2 and 326 IAC 2-3, will replace a part or piece of equipment in an existing process, is not a replacement or reconstruction of an entire process, and will not result in an increase in actual emissions. Therefore, this modification is being performed pursuant to 326 IAC 2-7-10.5(d)(7).

(b) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as Minor Permit Modification No. 133-20411-00019 in accordance with 326 IAC 2-7-12(b). The Minor Permit Modification will give the source approval to operate the proposed emission units.

**County Attainment Status**

The source is located in Putnam County.

| Pollutant | Status |
|---|---|
| PM10 | Attainment or Unclassifiable |
| $SO_2$ | Attainment |
| $NO_2$ | Attainment or Unclassifiable |
| 1-Hour Ozone | Attainment or Unclassifiable |
| 8-Hour Ozone | Attainment or Unclassifiable |
| CO | Attainment or Unclassifiable |
| Lead | Attainment or Unclassifiable |

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standard. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Putnam County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(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.

**Source Status**

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

| Pollutant | Emissions (tons/year) |
|---|---|
| PM | 13.9 |
| PM-10 | 14.2 |
| SO2 | 0.04 |
| NOx | 6.1 |
| VOC | 241.3 |
| CO | 5.2 |
| Single HAP | 28.1 (Toluene) |
| Total HAPs | 84.9 |

(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 greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Potential to Emit After Issuance for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

| | Potential to Emit (PTE) of Modification After Issuance (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | $NO_X$ | VOC | CO | HAPs |
| PTE of Modification (Old Units Replaced: Booth A, Booth D, Booth E, Mask Washer #1, CX108) | -0.17 | -0.17 | 0 | 0 | -54.6 | 0 | -31.2 |
| PTE of Modification (New Replacement Units: PT537, PT538, PT539, Mask Washer A, CX115) | 0.17 | 0.17 | 0 | 0 | 54.6 | 0 | 31.2 |
| PTE of Modification (New Additional Unit FL116) | 1.12 | 1.12 | 0 | 0 | 4.96 | 0 | 3.33 |
| PSD Threshold Level | 250 | 250 | 250 | 250 | 250 | 250 | N/A |

| | Potential to Emit (PTE) of Source After Issuance (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | $NO_X$ | VOC | CO | HAPs |
| PTE of Modification (New Additional Unit FL116) | 1.12 | 1.12 | 0 | 0 | 4.96 | 0 | 3.33 |
| Hand Paint Spray Booths (PT537, PT515, PT538, PT539) | 0.17 | 0.17 | 0.0 | 0.0 | 34.2* | 0.0 | 11.58 |
| Robot Paint Spray Lines (PT531, PT532) | 0.09 | 0.09 | 0.0 | 0.0 | 40.22** | 0.0 | 10.04 |
| Flocking & Co-Extrusion (FL101, FL112, FL114, CX101, CX103, CX106, CX109, CX110, CX111, CX113, CX115) | 3.35 | 3.35 | 0.0 | 0.0 | 39.79 | 0.0 | 34.98 |
| Robot Paint Spray Lines (PT536) | 0.55 | 0.55 | 0.0 | 0.0 | 97.85** | 0.0 | 18.97 |
| Mask Washers (Mask Washers A and B) | 0.0 | 0.0 | 0.0 | 0.0 | 4.74*** | 0.0 | 4.74*** |
| Natural Gas Combustion | 0.12 | 0.47 | 0.04 | 6.13 | 0.34 | 5.15 | 0.12 |
| Robot Paint Spray Lines (PT540) | 9.58 | 9.58 | 0.00 | 0.00 | 24.16 | 0.00 | 4.42 |
| Total PTE for Source after Issuance | 14.98 | 15.33 | 0.04 | 6.13 | 246.3 | 5.15 | 88.18 |
| PSD Threshold Level | 250 | 250 | 250 | 250 | 250 | 250 | N/A |

* VOC emissions from Hand Paint Spray Booths (PT537, PT515, PT538, PT539) represent VOC emission limit pursuant to 326 IAC 8-1-6 as permitted in CP-133-5802-00019, issued October 7, 1996.
** Total VOC emissions from the PT531, PT532, and PT536 will be limited to 138.07 tons per year so that the requirements of 326 IAC 2-2 (PSD) do not apply. This limit includes a VOC emission limit of 97.85 tons per year for the PT536 pursuant to 326 IAC 8-1-6 as permitted in SSM 133-14228-00019.
*** Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer A and Mask Washer B shall be limited to 4.74 tons per 12 consecutive month period.

(a) This modification to an existing minor stationary source is not major because the emission increase of the modification is less than the PSD major source threshold levels. The source, including the emissions of the modification, is still a minor stationary source. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing minor stationary source will not change the PSD minor status after the modification because the emissions from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.4480, Subpart PPPP (Surface Coating of Plastic Parts and Products and (326 IAC 20-1-1)), effective April 19, 2004. The provisions of this Subpart apply to a source that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAPs) in the surface coating of plastic parts and products; and that is a major source, is located at a major source, or is part of a major source of emissions of HAPs, as defined at 40 CFR 63.2. This source is involved in the surface coating of plastics using more than 378 liters (100 gallons) per year of coatings that contain HAPs, and is a major source of HAPs. Therefore, the requirements of this rule apply to this source. The source is an existing affected source because it started coating plastic parts before December 4, 2002. The source has not chosen the method of compliance yet.

Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart PPPP no later than three (3) years after April 19, 2004. Since the compliance date of the rule has not passed and the Permittee has not chosen the method of compliance with Subpart PPPP, the detailed requirements of the NESHAP will not be included in this approval. Rather, this permit will state that the Permittee must comply with Subpart PPPP by the compliance date, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to compliance date. As an existing affected source, the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after April 19, 2004. In addition, the Permittee must submit an application for a significant permit modification in order to establish enforceable limits or establish the compliance method. Such application shall be submitted no later than twenty-seven (27) months after April 19, 2004.

Prior to the final promulgation of Subpart PPPP, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) were applicable to this source. The Permittee submitted the requisite Part 1 MACT Application on June 18, 2002, after the May 15, 2002 reporting deadline. Notwithstanding the Part 1 application, the Permittee is required to comply with an applicable MACT standard that is promulgated prior to the Section 112(j) MACT deadline for a Part 2 MACT application [40 CFR 63.52(a)]. Since such deadline has not occurred, and Subpart PPPP has been signed as a final rule, the Section 112(j) requirements no longer apply to this source and are instead replaced by the requirements of 40 CFR 63, Subpart PPPP.

(c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit No.T133-12660-00019 on March 19, 2002, but each of the proposed PSEUs (PT537, PT538, PT539, Mask Washer A, CX115, and FL116). has uncontrolled PTEs at less than 100 percent of the applicable major Part 70 thresholds. As such, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification to an existing minor stationary source is not major because the source, which is not one of the 28 listed source categories, does not have the potential to emit of 250 tons per year or more of any attainment regulated pollutant after enforceable controls and limitations. The source will continue to be a minor stationary source after the modification and no attainment regulated pollutant shall be emitted at a rate of 250 tons per year or more. Therefore, the PSD requirements will continue to not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Putnam County and is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (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.

**State Rule Applicability - Individual Facilities**

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, as defined by 40 CFR 63.41, after July 27, 1997, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the source is subject to 40 CFR 63, Subpart PPPP.

40 CFR 52 Subpart P (Indiana SIP)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. Therefore, the source shall comply as follows:

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the emission units in this modification (PT537, PT538, PT539, Mask Washer A, CX115, and FL116) shall not exceed the pound per hour emission rate established as E in the formula below:

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

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

(1) Pursuant to 326 IAC 6-3-1(b)(14), units PT538, Mask Washer A, FL116, and CX115 are each exempt from the requirements of 326 IAC 6-3, because each unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

(2) The requirements of 326 IAC 6-3-2 are applicable to units PT537 and PT539, since each of the units has the potential to use greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2(d), particulate emissions from units PT537 and PT539 shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source shall comply with this requirement by installing an internal mix manifold system and a waterwash for particulate control.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable to each of the emission units in this modification (PT537, PT538, PT539, Mask Washer A, CX115, and FL116), since each of the emission units does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

326 IAC 8-2 (Surface Coating Emission Limitations)

This plastic automotive trim molding and surface coating source is not one of the facility types listed in 326 IAC 8-2, therefore 326 IAC 8-2 does not apply.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), Mask Washer A is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations), because it was constructed in 2003, after the applicability date of January 1, 1980. Pursuant to this rule, the Permittee 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.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Mask Washer A is not subject to the requirements of 326 IAC 8-3-5 because the degreaser has a remote solvent reservoir.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

**Testing Requirements**

Testing is not required for the modification.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to units PT537 and PT539 are as follows:

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (537-P-1, 537-P-2, 537-O-1, 539-P-1, 539-P-2, 539-P-3, 539-O-1) 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.

These monitoring conditions are necessary because the water wash systems for units PT537 and PT539 must operate properly to ensure compliance with 40 CFR 52, Subpart P, 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations) and 326 IAC 2-7 (Part 70).

**Changes to the Part 70 Permit Due to This Modification:**

In addition to the changes requested to the permit for this modification, the application also included the following changes in descriptive information to previously permitted emission units, process areas, emission units IDs, and stack IDs:

(a) "Old Paint Room" is changed to "Hand Paint Spray Booths";

(b) "Booth B" is changed to "PT515";

(c) Mask Washer A is located in "North Paint Mix Room";

(d) "New Paint Room" is changed to "Robot Paint Spray Lines";

(e) The robot paint spray system is now identified as "PT531";

(f) "paint line, identified as the Small Parts Line" is changed to "hand paint spray booth, identified as PT532";

(g) "paint spray booth, identified as Small Parts Booth" is changed to "hand paint spray booth, identified as PT532";

(h) "Small Parts cool down" is changed to "hand paint spray booth cool down";

(i) "robot paint conveyor system" is changed to "robot paint spray line, identified as PT536";

(j) "Mask Washer #7" is changed to "Mask Washer B";

(k) Mask Washer B is located in "East Paint Mix Room"; and

(l) As part of the minor source modification, the following stacks were modified as follows:

(1) "OPA-1 and OPA-2" replaced with "537-P-1, 537-P-2, and 537-O-1";

(2) "OPD-1 and OPD-2" replaced with "538-P-1, 538-P-2, 538-P-3, and 538-O-1";

(3) "OPE-1, OPE-2, and OPE-3" replaced with "539-P-1, 539-P-2, 539-P-3, and 539-O-1";

(4) "OPM-1" is changed to "PMR-A-1".

OAQ is also making changes to descriptive information in Sections B.24, B.25, C.14, C.16, C.14, D.1.10, D.2.13, and D.3.7 in order to update the permit with important language from the current Title V permit model.

Based on this modification and the requested changes in descriptive information (described above), the following changes have been made to the Part 70 Operating Permit T133-12660-00019, with deleted language as ~~strikeouts~~ and new language **bolded**

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:

**Hand Paint Spray Booths**~~Old Paint Room~~

(a) one (1) paint spray booth, identified as ~~Booth A~~ **PT537**~~(OPA)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~two~~**three** (~~2~~**3**) stacks, identified as ~~OPA-1~~

~~and OPA-2~~**537-P-1, 537-P-2, 537-O-1**;

(b) one (1) paint spray booth, identified as ~~Booth B~~ **PT515**~~(OPB)~~, constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;

(c) one (1) paint spray booth, identified as ~~Booth D~~ **PT538**~~(OPD)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~two~~**four** (~~2~~**4**) stacks, identified as ~~OPD-1 and OPD-2~~**538-P-1, 538-P-2, 538-P-3, 538-O-1**;

(d) one (1) paint spray booth, identified as ~~Booth E~~ **PT539**~~(OPE)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~three~~**four** (~~3~~**4**) stacks, identified as ~~OPE-1, OPE-2, and OPE-3~~**539-P-1, 539-P-2, 539-P-3, 539-O-1**;

**North Paint Mix Room**

(e) one (1) Mask washer, identified as Mask Washer #~~1~~**A**, constructed in ~~1989~~**2003**, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as ~~OPM-1~~**PMR-A-1**;

**Robot Paint Spray Lines**~~New Paint Room~~

(f) one (1) robot paint spray system, **identified as PT531,** consisting of the following:
  (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;

(g) one (1) ~~paint line~~**hand paint spray booth**, identified as ~~the Small Parts Line~~**PT532**, consisting of the following:
  (1) one (1) **hand** paint spray booth, identified as ~~Small Parts Booth~~**PT532** (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
  (3) one (1) ~~Small Parts~~**hand paint spray booth** cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint ~~conveyor system~~ **spray line, identified as PT536**, constructed in 2001, consisting of the following:

**East Paint Mix Room**

(j) one (1) Mask washer, identified as Mask Washer #~~7~~**B**, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as ~~NPM-2~~**PMR-B-1**;

Co-Extrusion

(k) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, ~~CX108,~~ CX109, CX110, CX111, and CX113, all constructed in 1989, **and CX115, constructed in 2004,** 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**, and CX115 exhausting through stack E4**;

Flocking

(l) ~~Three~~**Four** (~~3~~**4**) Flockers for adhesive application, identified as FL101, FL112, ~~and~~ FL114**, and FL116**. Both FL101 and FL112 were constructed in 1989, FL114 was constructed in 2000**; FL116 was constructed in 2004**. **FL101, FL112, and FL114** ~~E~~**e**ach utiliz**e**~~ing~~ an air atomization spray application system, each equipped with an infrared (IR) oven. **FL116 utilizes a roll coating application system.** The FL101, 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. **FL116 exhausts through one (1) stack, identified as F6. The total combined potential usage of flocking material for the four flockers is 4.25 pounds per hour.**

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(**c**~~d~~) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] **[326 IAC 2-1.1-7]**

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-04~~25~~**30** (ask for OAQ~~, Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(4) Failure to take reasonable response steps shall constitute a ~~violation of~~ **deviation from** the permit.

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter,** ~~T~~the Permittee shall submit **by July 1** an ~~annual~~ emission statement **covering the previous calendar year** ~~certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4~~. The ~~annual~~ emission statement **shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and** shall meet the following requirements:

(1) Indicate estimated actual emissions of ~~criteria~~ **all** pollutants **listed in 326 IAC 2-6-4(a)** ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~;

(2) Indicate estimated actual emissions of ~~other~~ regulated pollutants ~~(~~as defined by 326 IAC 2-7-1~~)~~ **(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule")** from the source, for purposes of ~~Part 70~~ fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.~~ The ~~annual emission~~ statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
Indianapolis, Indiana 4620~~46-6015~~

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**b**) The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
**Hand Paint Spray Booths**~~Old Paint Room~~

(a) one (1) paint spray booth, identified as ~~Booth A~~ **PT537**~~(OPA)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~two~~**three** (~~2~~**3**) stacks, identified as ~~OPA-1 and OPA-2~~**537-P-1, 537-P-2, 537-O-1**;

(b) one (1) paint spray booth, identified as ~~Booth B~~ **PT515**~~(OPB)~~, constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;

(c) one (1) paint spray booth, identified as ~~Booth D~~ **PT538**~~(OPD)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~two~~**four** (~~2~~**4**) stacks, identified as ~~OPD-1 and OPD-2~~**538-P-1, 538-P-2, 538-P-3, 538-O-1**;

(d) one (1) paint spray booth, identified as ~~Booth E~~ **PT539**~~(OPE)~~, constructed in ~~1989~~**2001**, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through ~~three~~**four** (~~3~~**4**) stacks, identified as ~~OPE-1, OPE-2, and OPE-3~~**539-P-1, 539-P-2, 539-P-3, 539-O-1**;

**North Paint Mix Room**

(e) one (1) Mask washer, identified as Mask Washer #~~1~~**A**, constructed in ~~1989~~**2003**, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as ~~OPM-1~~**PMR-A-1**;

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

Pursuant to CP-133-5802-00019, issued October 7, 1996, the best available control technology (BACT) for the spray coating of plastic automobile trim in ~~Booths A, B, D, and E~~**PT537, PT515, PT538, and PT539** shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators in ~~Booths A, B, D, and E~~**PT537, PT515, PT538, and PT539** shall not exceed 34.2 tons per twelve (12) consecutive month period. This usage limit is equivalent to 34.2 tons of VOC per twelve (12) consecutive month period.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the ~~Old Paint Room~~**hand paint** spray booths, identified as ~~Booths A, B, D, and E~~**PT537, PT515, PT538, and PT539** shall not exceed the pound per hour emission rate established as E in the following formula:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for Mask Washer #~~1~~**A**, a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table ~~1~~2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.~~2398~~**4501**]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements **no later than April 19, 2004,** ~~on and after~~ the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

**(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition**

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements **no later than** ~~on and after the date that is~~ three (3) years after **April 19, 2004,** the effective date of 40 CFR Part 63, Subpart PPPP.

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs ~~OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3~~**537-P-1, 537-P-2, 537-O-1, OPB-1, 538-P-1, 538-P-2, 538-P-3, 538-O-1, 539-P-1, 539-P-2, 539-P-3, and 539-O-1**) 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 ~~violation of~~ **deviation from** this permit.

(b) Monthly 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 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~~ **deviation from** this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:**
**Robot Paint Spray Lines**~~New Paint Room~~
(f) one (1) robot paint spray system, **identified as PT531,** consisting of the following:
(g) one (1) ~~paint line~~**hand paint spray booth**, identified as ~~the Small Parts Line~~**PT532**, consisting of the following:
(1) one (1) **hand** paint spray booth, identified as ~~Small Parts Booth~~**PT532** (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
(3) one (1) ~~Small Parts~~**hand paint spray booth** cool down (NPSD), exhausting through one (1) stack,

identified as NPSD-1;

(h) one (1) robot paint ~~conveyor system~~ **spray line, identified as PT536**, constructed in 2001, consisting of the following:

**East Paint Mix Room**

(j) one (1) Mask washer, identified as Mask Washer #~~7~~**B**, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as ~~NPM-2~~**PMR-B-1**;

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

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

(a) Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system**, identified as PT531,** and the ~~Small Parts Line~~**hand paint spray booth, identified as PT532**) shall be:

(1) the use of a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system;

(2) the use of a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system**, identified as PT531,** and the ~~Small Parts Line~~**hand paint spray booth, identified as PT532,** are in operation; and

(3) The total amount of VOC delivered to the applicators of the robot paint spray system**, identified as PT531,** and the ~~Small Parts Line~~**hand paint spray booth, identified as PT532,** shall not exceed 63.6 tons per twelve (12) consecutive month period. This usage limit is equivalent to 63.6 tons of VOC per twelve (12) consecutive month period.

(b) Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint ~~conveyor system~~ **spray line, identified as PT536,** without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total input of VOC to the robot paint spray system**, identified as PT531,** the ~~Small Parts Line~~**hand paint spray booth, identified as PT532**, and the robot paint ~~conveyor system~~ **spray line, identified as PT536,** shall not exceed 138.07 tons per 12 consecutive month period, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer #~~7~~**B** and Mask Washer #~~1~~**A** of Section D.1 shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) Any change or modification which increases emissions from the robot paint spray system**, identified as PT531**, the ~~Small Parts Line~~**hand paint spray booth, identified as PT532**, or the robot paint ~~conveyor system~~ **spray line, identified as PT536, including Mask Washer B** of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

(a) Pursuant to 40 CFR 52 Subpart P and CP 133-8608-00019, issued on October 6, 1997, the particulate matter (PM) from each of the robot paint spray system**, identified as PT531**, and the ~~Small Parts Booth~~**hand paint spray booth, identified as PT532,** shall not exceed the pound per

hour emission rate established as E in the following formula:

(b) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the primer coat, base coat, the clear coat spray booths of the robot paint ~~conveyor system~~ **spray line, identified as PT536**, and the robot paint line, identified as PT 540 shall not exceed the pound per hour emission rate established as E in the following formula:

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Mask Washer ~~#7~~**B**, which is a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for Mask Washer ~~#7~~**B**, 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 :

D.2.8 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A]
[Table ~~1~~2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

D.2.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the robot paint line, PT 540, robot paint spray system**, identified as PT531,** the ~~Small Parts Line~~**hand paint spray booth, identified as PT532**, and the robot paint ~~conveyor operation~~ **spray line, identified as PT536** and their control devices.

D.2.13 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9, 540-S, 540-SW, and 540-NW) 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 ~~violation of~~ **deviation from** this permit.

(b) Monthly 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 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~~ **deviation from** this permit.

D.2.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, ~~and~~ D.2.2**, and D.2.3** 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.3 FACILITY OPERATION CONDITIONS**

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

(~~l~~**k**) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, ~~CX108,~~ CX109, CX110, CX111, and CX113, all constructed in 1989, **and CX115, constructed in 2004,** 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**, and CX115 exhausting through stack E4**;

Flocking

(~~m~~l) ~~Three~~**Four** (~~3~~4) Flockers for adhesive application, identified as FL101, FL112, ~~and~~ FL114**, and FL116**. Both FL101 and FL112 were constructed in 1989, FL114 was constructed in 2000**; FL116 was constructed in 2004**. **FL101, FL112, and FL114 ~~E~~e**ach utiliz~~e~~ing an air atomization spray application system, each equipped with an infrared (IR) oven. **FL116 utilizes a roll coating application system.** The FL101, 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. **FL116 exhausts through one (1) stack, identified as F6. The total combined potential usage of flocking material for the four flockers is 4.25 pounds per hour.**

(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]

(b) Any change or modification which increases emissions of VOC from the ~~three~~**four** (~~3~~4) 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) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the ~~three~~**four** (~~3~~4) flockers shall not exceed the pound per hour emission rate established as E in the following formula:

D.3.7 Monitoring

(a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the ~~three~~**four** (~~3~~4) flocker stacks (Stack IDs F1, F4**, F5** 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~~ **deviation from** 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~~ **deviation from** this permit.

D.3.8 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~~**four** (~~3~~**4**) 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.

**Part 70 Quarterly Report for VOC Usage**
Facility: ~~Booths A, B, D, and E~~**PT537, PT515, PT538, and PT539**

**Part 70 Quarterly Report for VOC and HAP Usages**
Facility: Mask washer #~~1~~**A** and Mask Washer #~~7~~**B**

**Part 70 Quarterly Report for VOC Usage**
Facility: Robot paint spray system**, identified as PT531,** and the ~~Small Parts Booth~~**hand paint spray booth, identified as PT532,**

**Part 70 Quarterly Report for VOC Usage**
Facility: Robot paint ~~conveyor system~~ **spray line, identified as PT536**

**Part 70 Quarterly Report for VOC Usage**
Facility: Robot paint spray system**, identified as PT531,** ~~Small Parts Booth~~**hand paint spray booth, identified as PT532**, and robot paint ~~conveyor system~~ **spray line, identified as PT536**

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 133-20067-00019. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 133-20411-00019.

**Appendix A: Emission Calculations Summary**



**Company Name:** **H.A. Parts Products of Indiana Company**
**Address City IN Zip:** **2200 State Road 240 East, Greencastle, Indiana 46135**
**Operating Permit No.:** **133-20067**
**Plt ID:** **133-00019**
**Reviewer:** **Nathan C. Bell**
**Date:** **January 27, 2005**

| **Potential Emissions (Uncontrolled) (tons/year)** | | | |
|---|---|---|---|
| | Emissions Generating Activity | | |
| Pollutant | Hand Paint Spray Booths and Mask Washer A | Flocking and Co-Extrusion | **TOTAL**** |
| PM | 16.9 | 1.12 | 17.97 |
| PM10 | 16.9 | 1.12 | 17.97 |
| SO2 | | | |
| NOx | | | |
| VOC | 52.34 | 7.9 | 60.24 |
| CO | | | |
| Xylene | 1.6 | | 1.6 |
| Ethyl Benzene | 0.87 | | 0.87 |
| MEK | 0.95 | | 0.95 |
| Toluene | 25.4 | 0.36 | 25.8 |
| Isopropyl Benzene | 0.014 | | 0.014 |
| Methanol | 0.002 | | 0.002 |
| Glycol Ethers | 0.30 | | 0.30 |
| MEK | | 2.6 | 2.6 |
| MIBK | | 3.0 | 3.0 |
| Methyl Methacrylate | | 0.007 | 0.007 |
| Formaldehyde | | 0.001 | 0.001 |
| total HAPs | 29.1 | 6.0 | 35.2 |
| worst case single HAP | | | 25.8 |

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

| **Potential Emissions (Controlled) (tons/year)** | | | |
|---|---|---|---|
| | Emissions Generating Activity | | |
| Pollutant | Hand Paint Spray Booths and Mask Washer A | Flocking and Co-Extrusion | **TOTAL**** |
| PM | 0.17 | 1.12 | 1.29 |
| PM10 | 0.17 | 1.12 | 1.29 |
| SO2 | | | |
| NOx | | | |
| VOC | 52.3 | 7.3 | 59.6 |
| CO | | | |
| Xylene | 1.6 | | 1.6 |
| Ethyl Benzene | 0.87 | | 0.87 |
| MEK | 0.95 | | 0.95 |

**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 Road 240 East, Greencastle, Indiana 46135**
**Operating Permit No.:** **133-20067**
**Plt ID:** **133-00019**
**Reviewer:** **Nathan C. Bell**
**Date:** **January 27, 2005**

| Material (as applied) | Process | Density (Lb/Gal) | Weight % Volatile (H20& 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 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Hand Paint Spray Booths** | | | | | | | | | | | | | | | |
| Bright Silver FG24207 (Worst Case VOC) | PT537 | 8.07 | 70.3% | 0% | 70.3% | 0% | 29.7% | 0.0150 | 20 | 5.7 | 5.68 | 1.70 | 40.86 | 7.46 | |
| Alpine White FG27008 (Worst Case PM) | PT537 | 9.90 | 47.3% | 0% | 47.3% | 0% | 52.7% | 0.0150 | 20 | 4.7 | 4.68 | 1.41 | 33.72 | 6.15 | |
| Clear Coat FG14217 | PT537 | 8.09 | 61.7% | 0% | 61.7% | 0% | 38.3% | 0.0087 | 20 | 5.0 | 4.99 | 0.87 | 20.83 | 3.80 | |
| | | | | | | | | | | | | **2.57** | **61.70** | **11.26** | |
| Cream White FG 26426 (Worst Case PM) | PT538 | 9.96 | 39.8% | 0% | 39.8% | 0% | 60.2% | 0.0052 | 40 | 4.0 | 3.96 | 0.82 | 19.77 | 3.61 | |
| Green Gray FG 26427 (Worst Case VOC) | PT538 | 7.95 | 67.4% | 0% | 67.4% | 0% | 32.7% | 0.0052 | 40 | 5.4 | 5.35 | 1.11 | 26.73 | 4.88 | |
| Clear Coat FG 14217 | PT538 | 8.09 | 61.7% | 0% | 61.7% | 0% | 38.3% | 0.0043 | 40 | 5.0 | 4.99 | 0.86 | 20.59 | 3.76 | |
| Primer 117UKD FG23404 | PT538 | 8.07 | 74.8% | 0% | 74.8% | 0% | 38.3% | 0.0044 | 40 | 6.0 | 6.04 | 1.06 | 25.50 | 4.65 | |
| | | | | | | | | | | | | **3.03** | **72.82** | **13.29** | |
| Bright Silver FG24207 (Worst Case VOC) | PT539 | 8.07 | 70.3% | 0% | 70.3% | 0% | 29.7% | 0.0095 | 24 | 5.7 | 5.68 | 1.29 | 31.06 | 5.67 | |
| Alpine White FG27008 (Worst Case PM) | PT539 | 9.90 | 47.3% | 0% | 47.3% | 0% | 52.7% | 0.0095 | 24 | 4.7 | 4.68 | 1.07 | 25.63 | 4.68 | |
| Clear Coat FG14217 | PT539 | 8.09 | 61.7% | 0% | 61.7% | 0% | 38.3% | 0.0052 | 24 | 5.0 | 4.99 | 0.62 | 14.94 | 2.73 | |
| | | | | | | | | | | | | **1.92** | **46.00** | **8.39** | |
| **North Paint Mix Room** | | | | | | | | | | | | | | | |
| Toluene/Acetone Wash | Mask Washer A | 7.04 | 100% | 32.9% | 67.1% | 0% | 0% | 1.0 | 0.94 | 4.7 | 4.72 | **4.43** | **106.29** | **19.40** | |

**Total PTE (uncontrolled)** **11.95** **287** **52.3**

| Control Efficiency: | | Controlled | Controlled | Controlled | |
|---|---|---|---|---|---|
| Material Usage Limitation | PM | VOC lbs per Hour | VOC lbs per Day | VOC tons per Year | |
| 0.00% | 99.00% | **11.95** | **287** | **52.3** | |

**Total PTE (controlled)**

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 (Page 1 of 2)

**Company Name:** H.A. Parts Products of Indiana Company
**Address City IN Zip:** 2200 State Road 240 East, Greencastle, Indiana 46135
**Operating Permit No.:** 133-20067
**Plt ID:** 133-00019
**Reviewer:** Nathan C. Bell
**Date:** January 27, 2005

| Material | Process | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Ethyl Benzene | Weight % MEK | Weight % Toluene | Weight % Isopropyl benzene | Weight % Methanol | Weight % Glycol Ether | Xylene Emissions (ton/yr) | Ethyl Benzene Emissions (ton/yr) | MEK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Isopr Benz Emiss (ton/ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Hand Paint Spray Booths** | | | | | | | | | | | | | | | | |
| Alpine White FG27008 (Worst Case HAPs) | PT537 | 9.90 | 0.0150 | 20 | 2.48% | 2.41% | 0.13% | 8.10% | 0.02% | 0.01% | 0.02% | 0.32 | 0.31 | 0.02 | 1.05 | 0.0( |
| Clear Coat FG14217 | PT537 | 8.09 | 0.0087 | 20 | 1.38% | | | 9.00% | | | | 0.08 | | | 0.55 | |
| Rio Red FG 23291 (Worst Case HAPs) | PT538 | 8.34 | 0.0052 | 40 | 7.02% | 3.77% | 1.73% | 0.14% | 0.03% | | | 0.53 | 0.29 | 0.13 | 0.01 | 0.0( |
| Clear Coat FG 14217 | PT538 | 8.09 | 0.0043 | 40 | 1.38% | | | 9.00% | | | | 0.08 | | | 0.55 | |
| Primer 117UKD FG23404 | PT538 | 8.07 | 0.0044 | 40 | 3.66% | 0.51% | 12.70% | 42.95% | 0.13% | | 4.82% | 0.23 | 0.03 | 0.79 | 2.67 | 0.0 |
| Alpine White FG27008 (Worst Case HAPs) | PT539 | 9.90 | 0.0095 | 24 | 2.48% | 2.41% | 0.13% | 8.10% | 0.02% | 0.01% | 0.02% | 0.25 | 0.24 | 0.01 | 0.80 | 0.0( |
| Clear Coat FG14217 | PT539 | 8.09 | 0.0052 | 24 | 1.38% | | | 9.00% | | | | 0.06 | | | 0.40 | |
| **North Paint Mix Room** | | | | | | | | | | | | | | | | |
| Toluene/Acetone Wash | Mask Washer A | 7.04 | 1.0 | 0.94 | | | | 67.10% | | | | | | | 19.40 | |
| | | | | | | | | | | | **Total PTE HAPs (uncontrolled)** | **1.56** | **0.87** | **0.95** | **25.4** | **0.0** |

**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 * Material Usage Limitation

**Combined Total PTE HA**

## Appendix A: Emission Calculations
## VOC and Particulate
## From Flocking and Co-Extrusion

**Company Name:** **H.A. Parts Products of Indiana Company**
**Address City IN Zip:** **2200 State Road 240 East, Greencastle, Indiana 46135**
**Operating Permit No.:** **133-20067**
**Plt ID:** **133-00019**
**Reviewer:** **Nathan C. Bell**
**Date:** **January 27, 2005**

| Material (as applied) | Process | Density (Lb/Gal) | Weight % Volatile (H20& 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 | Pa P |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Flocking** | | | | | | | | | | | | | | | |
| Adhesive, MIBK, Catalyst | FL116 | 7.38 | 80.00% | 0.00% | 80.00% | 0.00% | 20.00% | 1.1 lbs/hr | | 5.9 | 5.90 | 1.13 | 27.20 | 4.96 | |
| **Co-Extrusion** | | | | | | | | | | | | | | | |
| A-1689-B/MEK Mix | CX115 | 6.76 | 98.50% | 0.00% | 98.50% | 0.00% | 1.50% | 1.0 | 0.10 | 6.7 | 6.66 | 0.67 | 16.06 | 2.93 | |
| | | | | | | | | | **Total Potential to Emit (uncontrolled)** | | | **1.80** | **43.26** | **7.89** | |

Pototential Material Usage for FL116 assumed to be one-third of 4.25 lbs/hr = 1.42 lbs/hr
Pototential Material Usage for CX115 assumed to be one-eighth of 0.80 gal/hr for A-1689-B/MEK Mix = 0.10 gal/hr

| | Control Efficiency: | | Controlled | Controlled | Controlled | Cc |
|---|---|---|---|---|---|---|
| | Material Usage Limitation for Co-Extrusion | PM | VOC lbs per Hour | VOC lbs per Day | VOC tons per Year | t |
| **Total Potential to Emit (controlled)** | 78.21% | 0% | **1.66** | **39.76** | **7.26** | |

Note: VOC emissions from co-extrusion will be limited to less than 25 tons per year so that the requirements of 326 IAC 8-1-6 do not apply.

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: Emission Calculations
## HAP Emissions
## From Flocking and Co-Extrusion

**Company Name:** H.A. Parts Products of Indiana Company
**Address City IN Zip:** 2200 State Road 240 East, Greencastle, Indiana 46135
**Operating Permit No.:** 133-20067
**Plt ID:** 133-00019
**Reviewer:** Nathan C. Bell
**Date:** January 27, 2005

**State Potential Emissions (uncontrolled):**

| Material (as applied) | Process | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % MEK | Weight % MIBK | Weight % Toluene | Weight % Methyl Methacrylate | Weight % Formaldehyde | MEK Emissions ton/yr | MIBK Emissions ton/yr | Toluene Emissions ton/yr | Methyl Methacrylate Emissions ton/yr | Formaldel Emissio ton/yr |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Flocking** | | | | | | | | | | | | | | |
| Adhesive, MIBK, Catalyst | FL116 | 7.38 | 1.1 lbs/hr | | 4.9% | 65.4% | 1.3% | | | 0.23 | 3.04 | 0.06 | | |
| **Co-Extrusion** | | | | | | | | | | | | | | |
| A-1689-B/MEK Mix | CX115 | 6.76 | 1.0 | 0.10 | 81.3% | | 10% | 0.25% | 0.03% | 2.41 | | 0.30 | 0.01 | 0.001 |
| | | | | | | | | | **Total Potential to Emit (uncontrolled)** | **2.63** | **3.04** | **0.36** | **0.01** | **0.001** |

**Total Potential to Emit (uncontrolled)** **6.04**

| Material Usage Limitation | | | | | |
|---|---|---|---|---|---|
| 78.21% | **2.11** | **3.04** | **0.29** | **0.01** | **0.001** |

**Total Potential to Emit (controlled)** **5.45**

**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