INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

October 19, 2004

TO: Interested Parties / Applicant

RE: GDX Automotive North America, Inc. / 169-20170-00004

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

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

October 19, 2004

Mr. Randy Shepherd
GDX Automotive North America, Inc.
P.O. Box 507
Wabash, IN 46992

Re: 169-20170
Third Administrative Amendment to
Part 70 Permit No. 169-5650-00004

Dear Mr. Shepherd:

GDX Automotive North America, Inc. (formerly known as GenCorp Inc., dba GDX Automotive, Inc.) was issued a Part 70 Permit permit on April 15, 2002, for a stationary rubber and plastic parts manufacturing operation. A letter requesting a permit amendment to modify existing surface coating operation (Line 4) was received on March 25, 2004.

Based on the information provided by GDX Automotive North America, Inc., Line 4-Topcoat Spray Booth will be utilized to spray coat a new product. As a result of this modification, the VOC emissions will increase by 2.71 tons per year from 13.57 to 16.28 tons per year; there is no increase in single HAP and total HAPs emissions (See Appendix A, Emission Calculations, two (2) pages). IDEM, OAQ has determined that the potential emissions increase from this modification is at exemption level. Therefore, this modification to Line 4 is being performed though an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) because it is a revision that will not trigger a new applicable requirement or violate a permit term. With this modification, Line 4 topcoat surface coating operation will still comply with Condition D.2.1 (New Source Toxics Control [326 IAC 2-4.1-1]), which requires single HAP and total HAPs be limited to less than 10 and 25 tons per year, respectively. Similarly, Line 4 will also comply with Condition D.2.3 (General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]), which requires VOC emissions be limited to less than 25 tons per year. As a result of this modification, Line 4 will still have potential emissions of VOC, single HAP and total HAPs less than 25, 10 and 25 tons per year, respectively. The PM emissions from Line 4 are subject to rule 326 IAC 6-3-2, which is already contained in the Part 70 Permit under Condition D.2.2. Line 4 Topcoat Spray Booth still complies with 326 IAC 6-3-2.

Pursuant to the current source request and the provisions of 326 IAC 2-7-11(a)(8), the permit is hereby administratively amended to modify the Line-4 topcoat spray booth. There are no changes in the permit language as a result of this revision

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 Adeel Yousuf, at (973) 575-2555, ext. 3252 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

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

Attachments
AY / EVP

cc: File – Wabash County
U.S. EPA, Region V
Wabash County Health Department
Air Compliance Section Inspector – Ryan Hillman
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: GDX Automotive North America Inc.
Address City IN Zip: One General Street, Wabash, Indiana 46992
Permit No.: AA 169-20170-00004
Reviewer: Adeel Yousuf / EVP
Date: October 13, 2004

Unit ID: Line 4 - Topcoat Spray Booth

Existing Emissions from Line 4 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Usage (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer (459X)	7.20	96.40%	0.00%	96.40%	0.00%	3.50%	0.380	6.94	6.94	2.637504	63.300096	11.552268	0.11	198.31	75%
Catalyst *8370A)	8.91	0.75%	0.00%	0.75%	0.00%	99.25%	0.010	0.07	0.07	0.000668	0.016038	0.002927	0.10	0.07	75%
Basecoat (8370A)	8.91	20.60%	0.00%	20.60%	0.00%	0.00%	0.250	1.84	1.84	0.458865	11.012760	2.009829	1.94	#DIV/0!	75%

State Potential Emissions			**3.10**	**74.33**	**13.57**	**2.14**

Controlled Potential Emissions

	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Controlled Potential Emissions:	0.00%	80.00%	**3.10**	**74.33**	**13.57**	**0.43**

* Original TSD of the Part 70 Permit (169-20170-00004) incorrectly lists Line 4 -Topcoat Spray Booth as Line 3-Topcoat Spray Booths. The emissions in the TSD for Line-4 are incorrect as well. Above emissions are based on the correction submitted by the source to IDEM on June 5, 2001.

New Emissions from Line 4 Due to New Product Being Coated

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Usage (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer (459X)	7.28	96.50%	0.00%	96.50%	0.00%	3.50%	0.340	7.03	7.03	2.388568	57.325632	10.461928	0.09	200.72	75%
Basecoat (8370A)	8.61	82.32%	57.04%	25.28%	0.00%	0.00%	0.610	2.18	2.18	1.327731	31.865541	5.815461	1.02	#DIV/0!	75%

State Potential Emissions			**3.72**	**89.19**	**16.28**	**1.11**

Controlled Potential Emissions

	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Controlled Potential Emissions:	0.00%	80.00%	**3.72**	**89.19**	**16.28**	**0.22**

METHODOLOGY

Net Change in Emissions (ton/yr): **2.71** **-0.21**

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)
Total = Sum of worst case coatings in each booth

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: GDX Automotive North America Inc.
Address City IN Zip: One General Street, Wabash, Indiana 46992
Permit No.: AA 169-20170-00004
Reviewer: Adeel Yousuf / EVP
Date: October 13, 2004

Unit ID: Line 4 - Topcoat Spray Booth

Existing Emissions from Line 4 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Process/Coating ID	Density (Lb/Gal)	Maximum Usage	Weight %	Weight %	Weight %	Ethylbenzene Emissions	Xylene Emissions	Glycol Ethers Emissions	Total
		(gal/hr)	Ethylbenzene	Xylene	Glycol Ethers	(ton/yr)	(ton/yr)	(ton/yr)	
Primer (459X)	7.20	0.380	20.00%	80.00%	0.00%	2.40	9.59	0.00	11.98
Catalyst *8370A)	8.91	0.010	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Basecoat (8370A)	8.91	0.250	0.00%	0.00%	5.00%	0.00	0.00	0.49	0.49
						2.40	9.59	0.49	12.47

* Original TSD of the Part 70 Permit (169-20170-00004) incorrectly lists Line 4 -Topcoat Spray Booth as Line 3-Topcoat Spray Booths. The emissions in the TSD for Line-4 are incorrect as well. Above emissions are based on the correction submitted by the source to IDEM on June 5, 2001.

New Emissions from Line 4 Due to New Product Being Coated

Process/Coating ID	Density (Lb/Gal)	Maximum Usage	Weight %	Weight %	Weight %	Ethylbenzene Emissions	Xylene Emissions	Glycol Ethers Emissions	Total
		(gal/hr)	Ethylbenzene	Xylene	Glycol Ethers	(ton/yr)	(ton/yr)	(ton/yr)	
Primer (459X)	7.28	0.340	20.00%	80.00%	0.00%	2.17	8.67	0.00	10.84
Basecoat (8370A)	8.61	0.610	0.00%	0.00%	4.75%	0.00	0.00	1.09	1.09
						2.17	8.67	1.09	11.93
Total Uncontrolled Potential Emissions			**Net Change in Emissions (ton/yr):**			-0.23	-0.91	0.60	**-0.54**

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