



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 9, 2004

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

TO: Interested Parties / Applicant

RE: T.G. Missouri Corp. / 043-20232-00058

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of 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.dot 9/16/03



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**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**TG Missouri Corporation
5331 Foundation Blvd.
New Albany, Indiana 47150**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 043-20232-00058	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 9, 2004 Expiration Date: December 9,2009

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic automotive parts manufacturing source.

Authorized Individual:	Executive Vice President
Source Address:	5331 Foundation Blvd., New Albany, Indiana 47150
Mailing Address:	2200 Plattin Rd., Perryville, MO 63775
General Source Phone:	(573) 547-1041
SIC Code:	3714
County Location:	Floyd
Source Location Status:	Nonattainment area for the 8-hour Ozone Standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) surface coating line, identified as P15, consisting of:
 - (1) One (1) paint kitchen (shared with P16) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to stacks P15-1 and P15-2, capacity: 225 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.
- (b) One (1) surface coating line, identified as P16, consisting of:
 - (1) One (1) paint kitchen (shared with P15) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to stacks P16-1 and P16-2, capacity: 450 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.
- (c) One (1) surface coating line, identified as P17, consisting of:
 - (1) One (1) paint kitchen for mixing coatings in covered pails, exhausting to stack

PK-1.

- (2) One (1) spray booth, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to stacks P17-1 through P17-7, capacity: 154 plastic automotive parts per hour.
- (3) One (1) cure oven, rated 1.0 million British thermal units per hour.
- (4) Two (2) natural gas-fired air makeup units, rated 5.0 million British thermal units per hour, each.
- (d) Fourteen (14) injection molding machines, capacity: 460 pounds of polypropylene resin pellets per hour, total.
- (e) Maintenance welding, with total weld wire or rod usage less than 625 pounds per day, including:
 - (1) One (1) MIG welder.
 - (2) One (1) stick welder.
- (f) Six (6) natural gas-fired air makeup units, rated 3.14 million British thermal units per hour, each.
- (g) One (1) natural gas-fired fluidized bed for cleaning paint racks, rated 0.892 million British thermal units per hour.
- (h) Two (2) natural gas-fired space heaters, rated 1.008 million British thermal units per hour, each.
- (i) Two (2) natural gas-fired office furnaces, rated 0.6182 million British thermal units per hour, each.
- (j) Electric infrared curing equipment.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit 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.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been

revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit 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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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 as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

-
- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
 - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

-
- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission 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.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) surface coating line, identified as P15, consisting of:
 - (1) One (1) paint kitchen (shared with P16) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLV) spray guns and dry filters for overspray control, exhausting to stacks P15-1 and P15-2, capacity: 225 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.
- (b) One (1) surface coating line, identified as P16, consisting of:
 - (1) One (1) paint kitchen (shared with P15) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLV) spray guns and dry filters for overspray control, exhausting to stacks P16-1 and P16-2, capacity: 450 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.
- (c) One (1) surface coating line, identified as P17, consisting of:
 - (1) One (1) paint kitchen for mixing coatings in covered pails, exhausting to stack PK-1.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLV) spray guns and dry filters for overspray control, exhausting to stacks P17-1 through P17-7, capacity: 154 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 1.0 million British thermal units per hour.
 - (4) Two (2) natural gas-fired air makeup units, rated 5.0 million British thermal units per hour, each.
- (d) Fourteen (14) injection molding machines, capacity: 460 pounds of polypropylene resin pellets per hour, total.
- (e) Maintenance welding, with total weld wire or rod usage less than 625 pounds per day, including:
 - (1) One (1) MIG welder.
 - (2) One (1) stick welder.
- (f) Six (6) natural gas-fired air makeup units, rated 3.14 million British thermal units per hour, each.
- (g) One (1) natural gas-fired fluidized bed for cleaning paint racks, rated 0.892 million British thermal units per hour.

Emissions Unit Description: (continued)

- (h) Two (2) natural gas-fired space heaters, rated 1.008 million British thermal units per hour, each.
- (i) Two (2) natural gas-fired office furnaces, rated 0.6182 million British thermal units per hour, each.
- (j) Electric infrared curing equipment.

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

Emission Limitations and Standards

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

- (a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at one (1) surface coating line, identified as P17, shall be limited to 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per year from the surface coating line. Compliance with this limit makes 326 IAC 8-1-6 (New facilities; General reduction requirements) not applicable.
- (b) Any change or modification at the one (1) surface coating line, identified as P15, that increases the potential VOC usage to twenty-five (25) tons per twelve (12) consecutive month period shall increase the potential VOC emissions to twenty-five (25) tons per year or more. Such change or modification may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior IDEM, OAQ, approval.
- (c) Any change or modification at the one (1) surface coating line, identified as P16, that increases the potential VOC usage to twenty-five (25) tons per twelve (12) consecutive month period shall increase the potential VOC emissions to twenty-five (25) tons per year or more. Such change or modification may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior IDEM, OAQ, approval.
- (d) Any change or modification at any of the injection molding machines, that increases the potential VOC usage to more than 833 tons per twelve (12) consecutive month period shall increase the potential VOC emissions to twenty-five (25) tons per year or more. Such change or modification may cause the facility to become subject to 326 IAC 8-1-6 and shall require prior IDEM, OAQ, approval.

D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter, water-wash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) spray booths and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

-
- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used at each coating line. 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) The cleanup solvent usage for each month at each surface coating line;
 - (3) The total VOC usage for each month at each surface coating line; and
 - (4) The weight of VOCs emitted for each compliance period at each surface coating line.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records of control device inspections, repairs of the control device, and changes in operations as required by that condition.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section**

Quarterly Report

Company Name: TG Missouri Corporation
Location: 5331 Foundation Blvd., New Albany, IN 47150
Permit No.: MSOP 043-20232-00058
Facility: One (1) surface coating line, identified as P17
Parameter: VOC Usage
Limit: No more than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Year: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	TG Missouri Corporation
Address:	5331 Foundation Blvd.
City:	New Albany
Phone #:	(573) 547-1041
MSOP #:	043-20232-00058

I hereby certify that TG Missouri Corporation is still in operation.
 no longer in operation.

I hereby certify that TG Missouri Corporation is in compliance with the requirements of MSOP 043-20232-00058.
 not in compliance with the requirements of MSOP 043-20232-00058.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a New Source Construction and
Minor Source Operating Permit

Source Background and Description

Source Name:	TG Missouri Corporation
Source Location:	5331 Foundation Blvd., New Albany, Indiana 47150
County:	Floyd
SIC Code:	3714
Operation Permit No.:	MSOP 043-20232-00058
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed an application from TG Missouri Corporation relating to the construction and operation of a plastic automotive parts manufacturing source.

Permitted Emission Units and Pollution Control Equipment

There are no existing, permitted emission units at this source.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following new equipment:

- (a) One (1) surface coating line, identified as P15, consisting of:
 - (1) One (1) paint kitchen (shared with P16) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLPP) spray guns and dry filters for overspray control, exhausting to stacks P15-1 and P15-2, capacity: 225 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.

- (b) One (1) surface coating line, identified as P16, consisting of:
 - (1) One (1) paint kitchen (shared with P15) for mixing coatings in covered pails, exhausting to stack PK-2.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLPP) spray guns and dry filters for overspray control, exhausting to stacks P16-1 and P16-2, capacity: 450 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 0.6 million British thermal units per hour.

- (c) One (1) surface coating line, identified as P17, consisting of:
 - (1) One (1) paint kitchen for mixing coatings in covered pails, exhausting to stack PK-1.
 - (2) One (1) spray booth, equipped with high volume, low pressure (HVLP) spray guns and dry filters for overspray control, exhausting to stacks P17-1 through P17-7, capacity: 154 plastic automotive parts per hour.
 - (3) One (1) cure oven, rated 1.0 million British thermal units per hour.
 - (4) Two (2) natural gas-fired air makeup units, rated 5.0 million British thermal units per hour, each.
- (d) Fourteen (14) injection molding machines, capacity: 460 pounds of polypropylene resin pellets per hour, total.
- (e) Maintenance welding, with total weld wire or rod usage less than 625 pounds per day, including:
 - (1) One (1) MIG welder.
 - (2) One (1) stick welder.
- (f) Six (6) natural gas-fired air makeup units, rated 3.14 million British thermal units per hour, each.
- (g) One (1) natural gas-fired fluidized bed for cleaning paint racks, rated 0.892 million British thermal units per hour.
- (h) Two (2) natural gas-fired space heaters, rated 1.008 million British thermal units per hour, each.
- (i) Two (2) natural gas-fired office furnaces, rated 0.6182 million British thermal units per hour, each.
- (j) Electric infrared curing equipment.

Existing Approvals

There are no existing approvals.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PK-1	Paint Kitchen for P17	25.5	0.32	648	75
P17-1	Spray Booth (P17)	28	1.91	12,066	75
P17-2	Spray Booth (P17)	28	1.91	12,066	75
P17-3	Spray Booth (P17)	28	1.91	12,066	75
P17-4	Spray Booth (P17)	28	1.91	12,066	75
P17-5	Spray Booth (P17)	25.5	0.32	2,119	75
P17-6	Spray Booth (P17)	27	0.14	766	180
P17-7	Spray Booth (P17)	26	0.72	3,531	75
PK-2	Paint Kitchen for P15 and P16	27	0.83	650	75
P16-1	Spray Booth (P16)	27	2	8,000	75
P16-2	Spray Booth (P16)	27	1	2,400	180
P15-1	Spray Booth (P15)	27	2	8,000	75
P15-2	Spray Booth (P15)	27	1	2,400	180

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on October 8, 2004. Additional information was received on October 26 and 28, 2004.

Emission Calculations

See pages 1 through 6 of Appendix A of this document for detailed emission calculations.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	17.7
PM ₁₀	18.5
SO ₂	0.089
VOC	55.6
CO	12.5
NO _x	14.9

HAPs	Potential to Emit (tons/yr)
Benzene	0.0003
Dichlorobenzene	0.0002
Formaldehyde	0.011
Hexane	0.268
Toluene	0.006
Lead	0.0001
Cadmium	0.0002
Chromium	0.0002
Manganese	0.080
Nickel	0.0003
Xylene	0.349
Trichloroethylene	0.166
Total	0.832

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than twenty-five (25) tons per year and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. In addition, the potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Maintenance attainment
8-Hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Floyd County has been classified as attainment or unclassifiable in Indiana for all remaining 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

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

Pollutant	Emissions (tons/yr)
PM	4.98
PM ₁₀	5.83
SO ₂	0.089
VOC	47.7

Pollutant	Emissions (tons/yr)
CO	12.5
NO _x	14.9
Single HAP	0.349
Combination HAPs	0.832

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-1.1-5, the PSD and Emission Offset requirements do not apply.
- (b) The VOC emissions from the one (1) surface coating line, identified as P17, are limited to less than twenty-five (25) tons per year, including emissions from combustion. Therefore, 326 IAC 8-1-6 does not apply. As a result of that limit, the VOC from the entire source is limited to 47.7 tons per year. Also, the spray booths must operate the dry filters at all times, which will limit the potential to emit particulate from the source. All other emissions in this table are the unrestricted potential emissions.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) the combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) This proposed source only coats plastic automobile parts. Therefore, pursuant to 40 CFR 60.360(b), it is exempt from the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.360, Subpart MM).
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP (Part 63.4480) are not included in this permit because the proposed source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, Subpart WWWW (Part 63.5780) are not included in this permit because the proposed source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Air quality requirements)

The unrestricted potential VOC emissions and the unrestricted potential NO_x emissions are each less than one hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-1.1-5 for nonattainment new source review.

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

The unrestricted potential emissions of each attainment criteria pollutant are less than 250 tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this plastic automotive parts manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

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 the 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) 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter, water-wash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) The welding operations use less than 625 pounds of weld wire or rod per day, total. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

Pursuant to 326 IAC 8-7-2(a)(3)(K), emissions from plastic parts coating for automobiles are not counted towards the applicability of 326 IAC 8-7. The coating facilities at this source are all plastic coating facilities. Therefore, the VOC emissions from the coating facilities are not counted towards the applicability of 326 IAC 8-7. All other VOC emissions are from injection molding and natural gas combustion. The VOC emissions from those facilities are less than 10 tons per year at this source, which has coating facilities. Therefore, the requirements of 326 IAC 8-7 are not applicable. The aggregate potential emissions from those facilities are also less than 40 tons per year. Therefore, the recordkeeping requirements are not applicable pursuant to 326 IAC 8-7-2(c).

326 IAC 8-1-6 (New facilities; General reduction requirements)

The surface coating lines at this source are parallel operations. Therefore, they are considered separate facilities for the purposes of 326 IAC 8-1-6.

- (a) The potential VOC emissions from the one (1) surface coating line, identified as P15, are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The potential VOC emissions from the one (1) surface coating line, identified as P16, are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (c) The potential VOC emissions from each of the fourteen (14) injection molding machines are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (d) The potential VOC emissions from the one (1) surface coating line, identified as P17, are greater than 25 tons per year and there are no other rules applicable to the spray booth under 326 IAC 8. The applicant has agreed to limit the VOC usage at the surface coating line to 24.0 tons per consecutive twelve (12) month period, with compliance determined at the end of each month. This will limit the VOC emissions from this surface coating line to less than 25 tons per year, including VOC emissions from combustion. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

Pursuant to 326 IAC 10-1-1(a)(3), this rule is applicable to facilities requiring a permit under 326 IAC 2 that are constructed, modified, or reconstructed after the effective date of the rule and to which an NSPS does not apply. Although this source requires a permit under 326 IAC 2, there are no facilities with the potential to emit NO_x that alone would require a permit under 326 IAC 2. Therefore, the requirements of 326 IAC 10-1 are not applicable.

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This source does not have the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs. In addition, the resin used in the injection molding does not contain styrene. Therefore, the requirements of 326 IAC 20-25 are not applicable.

Conclusion

The construction and operation of this plastic automotive parts manufacturing source shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 043-20232-00058.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for New Construction and a Minor Source Operating Permit

Source Name:	TG Missouri Corporation
Source Location:	5331 Foundation Blvd., New Albany, Indiana 47150
County:	Floyd
Operation Permit No.:	MSOP 043-20232-00058
SIC Code:	3714
Permit Reviewer:	CarrieAnn Paukowits

On November 7, 2004, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that TG Missouri Corporation had applied for a construction and operating permit to construct and operate a plastic automotive parts manufacturing source with dry filters as controls. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 1, 2004, Cindy Rollet of TG Missouri Corporation submitted comments on the proposed construction operating permit. The summary of the comments and corresponding responses are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment 1:

Section A.1 of the permit (page 4 of 22) lists the plant as a Major Source of HAPs. This facility is a Minor Source, as shown throughout the rest of the permit.

Response 1:

Section A.1 has been corrected as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic automotive parts manufacturing source.

Authorized Individual:	Executive Vice President
Source Address:	5331 Foundation Blvd., New Albany, Indiana 47150
Mailing Address:	2200 Platin Rd., Perryville, MO 63775
General Source Phone:	(573) 547-1041
SIC Code:	3714
County Location:	Floyd
Source Location Status:	Nonattainment area for the 8-hour Ozone Standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR Major Minor Source, Section 112 of the Clean Air Act

Comment 2:

In Sections A.2, D.1 and the TSD, the surface coating lines are described with a maximum capacity based on a number of parts per hour. These numbers are correct for the plans that we have for these lines. However, for air permitting purposes, it seems more appropriate to base the maximum capacity on the maximum pounds of VOC throughput per hour. It is possible that part sizes or coverage could

change over the years and the maximum number of parts per hour may or may not be the same. A permit modification would only be required when the maximum VOC pounds per hour would be exceeded so this would be the appropriate maximum capacity indicator.

Response 2:

The information in Section A.2 is descriptive information, and is not an enforceable condition. IDEM, OAQ, is aware that the number of parts per hour may change due to a change in the size of the parts. Such change without an increase in emissions would only be a descriptive change. Thus, only a Notice Only Change to the permit would be required.

The applicable permitting level is based upon the potential to emit, which is the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. The VOC throughput is not a good description of the physical and operational design of the source because it can fluctuate based on changes in coatings, and VOC is not the only pollutant of concern with surface coating operations. Particulates (including PM₁₀) and hazardous air pollutants (HAPs) are also emitted from these coating processes. Changes that increase the potential to emit of any of these pollutants may require a permit revision under 326 IAC 2-6.1-6. Therefore, there is no change to the permit based on this comment.

Comment 3:

Section D.1.5(a)(1) of the permit (page 17 of 22) states that "Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used." For our record keeping, we plan to use a computer system that shows transfers of materials to each line rather than purchase records or invoices, as this method is more automated and more accurate. To be sure that this system of record keeping is within the requirements of our permit, we prefer the following statement instead of the one already drafted: "Records that may be used shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used."

Response 3:

When a permit application is submitted for a surface coating operation, the applicant is required to submit material safety data sheets. Since a source may change its coatings after the initial permit application submittal, IDEM, OAQ, requires the source to maintain such data sheets upon coating changes. This requirement will ensure that all coatings are appropriately documented based on vendor data, and that the source can readily demonstrate continued compliance with relevant VOC usage and/or emission limitations. Though the primary recordkeeping system at the source will be the computer system, purchase orders, invoices and material safety data sheets may be necessary to verify compliance with the permit. Therefore, there are no changes to this condition based on this comment.

Comments 4 and 5:

The HAP Hexamethylene Diisocyanate (HDI) has not been identified on the HAPs summary on page 4 of 9 of the TSD.

Page 4 of 6 of TSD Appendix A has a column in the table for TPY of toluene emissions. This column should be relabeled as HDI.

Responses 4 and 5:

The column for Toluene emissions on page 4 of 6 is actually for HDI emissions. The corrected spreadsheet is attached as page 1 of 2 of TSD Addendum Appendix A. As a result of that error, the

“Potential to Emit of the Source” table in the TSD is incorrect. This does not change the applicability of any rule, nor does it result in a change to the permit. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, the corrections have not been made to the TSD, but corrections to the table are as follows:

HAPs	Potential to Emit (tons/yr)
Benzene	0.0003
Dichlorobenzene	0.0002
Formaldehyde	0.011
Hexane	0.268
Toluene	0.006 0.0005
HDI	0.005
Lead	0.0001
Cadmium	0.0002
Chromium	0.0002
Manganese	0.080
Nickel	0.0003
Xylene	0.349
Trichloroethylene	0.166
Total	0.832

Comment 6:

Page 5 of 6 of the TSD Appendix A has the maximum hourly resin throughput listed as 450 lbs/hr. This should be 460 lbs/hr, as indicated in Section A.2(d).

Response 6:

The corrected spreadsheet is attached as page 2 of 2 of TSD Addendum Appendix A. The calculated potential VOC emissions from the injection molding increased from 0.591 tons per year to 0.604 tons per year as a result of this change. This does not change the applicability of any rules. In addition, due to rounding of the calculated potential to emit, the potential to emit VOC from this source is still 55.6 tons per year. There are no changes to the permit as a result of this change.

HAP Emission Calculations

Company Name: TG Missouri Corporation
 Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
 Permit Number: MSOP 043-20232
 Plt ID: 043-00058
 Reviewer: CarrieAnn Paukowits
 Application Date: October 8, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % HDI	Xylene Emissions (ton/yr)	HDI Emissions (ton/yr)	Total HAP Emissions (ton/yr)
P15								
467W	9.27	0.01106	180.000	0.00%	0.00%	0.000	0.000	0.000
P16								
467W	9.27	0.00658	225.000	0.00%	0.00%	0.000	0.000	0.000
P17								
303LE35	7.78	0.00172	360.000	1.00%	0.00%	0.211	0.000	0.211
LE9425B	8.06	0.00016	360.000	6.79%	0.27%	0.138	0.005	0.143
IA3-9-868	7.13	0.00139	360.000	0.00%	0.00%	0.000	0.000	0.000

Total State Potential Emissions **0.349 0.005 0.355**

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

**Addendum Appendix A: Emissions Calculations
Injection Molding**

Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Plt ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004

Material	Maximum pounds of resin per hour	Weight % VOC*	Weight % HAPs	Emission Factor (weight % of starting monomer emitted)	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per Year
Polypropylene resin pellets	460	1%	0%	3%	0.138	3.312	0.604
Totals:					0.138	3.31	0.604

Non-Open Molding Operations include the following: continuous lamination, pultrusion, marble casting, and closed molding.

METHODOLOGY

Potential VOC Pounds per Hour = Maximum pounds of resin per hour * Weight % of Monomer * Emission factor (weight % of starting monomer emitted)

Potential VOC Pounds per Day = Potential VOC Pounds per Hour * (24 hrs / 1 day)

Potential VOC Tons per Year = Potential VOC Pounds per Hour * (8760 hr/yr) * (1 ton / 2000 lbs)

Emission Factors for Marble Casting and Closed Molding are 3% for NVS and 2% for VS.

* This material contains a negligible amount of VOC. 1% is used for conservatism.

Other materials:

Expected Usage of Each material (cans/week)	Content of can (lbs/can)	Safety Factor	Maximum Usage (lbs/yr)
1	1	2	145.6

Material	Maximum pounds per year	Weight % VOC	Weight % Trichloroethylene	Tons of VOC per Year	Tons of Trichloroethylene per Year
Mold release	145.6	99%	0%	0.072	0.000
Cleaner/degreaser	145.6	97%	75%	0.071	0.055
Rust preventive	145.6	100%	85%	0.073	0.062
Totals:				0.215	0.116

METHODOLOGY

Maximum Usage (lbs/yr) = Expected usage (cans/week) * Content of can (lbs/can) * Safety Factor * 7 total days per week / 5 actual days per week * 52 weeks

Potential VOC Tons per Year = Maximum pounds per year * Weight % VOC / 2,000 lbs/ton

Potential HAP (Trichloroethylene) Tons per Year = Maximum pounds per year * Weight % HAP / 2,000 lbs/ton

Totals:

VOC (tons/yr)	HAP (tons/yr)
0.820	0.116

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Plt ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					VOC	CO
			PM*	PM10*	SO2	NOx	CO		
Cure oven for P15	0.60	5.26	0.005	0.020	0.002	0.263	0.014	0.221	
Cure oven for P16	0.60	5.26	0.005	0.020	0.002	0.263	0.014	0.221	
Cure oven for P17	1.00	8.76	0.008	0.033	0.003	0.438	0.024	0.368	
Two (2) air makeup units for P17	10.00	87.6	0.083	0.333	0.026	4.38	0.241	3.68	
Six (6) air makeup units for general source	18.84	165	0.157	0.627	0.050	8.25	0.454	6.93	
Fluidized bed	0.89	7.81	0.007	0.030	0.002	0.391	0.021	0.328	
Two (2) space heaters	2.02	17.7	0.017	0.067	0.005	0.883	0.049	0.742	
Two (2) office furnaces	1.24	10.8	0.010	0.041	0.003	0.542	0.030	0.455	
Total	35.18	297	0.283	1.13	0.089	14.9	0.818	12.5	

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Plt ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr	0.0003	0.0002	0.011	0.268	0.0005

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total HAPs
Potential Emission in tons/yr	0.0001	0.0002	0.0002	0.0001	0.0003	0.281

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Plt ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum* (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
P15																
467W	9.27	59.050%	43.9%	15.2%	53.5%	33.49%	0.01106	180.000	3.02	1.40	2.80	67.11	12.25	8.27	4.19	75%
P16																
467W	9.27	59.050%	43.9%	15.2%	53.5%	33.49%	0.00658	225.000	3.02	1.40	2.08	49.91	9.11	6.15	4.19	75%
P17																
303LE35	7.78	75.028%	0.0%	75.0%	0.0%	18.95%	0.00172	360.000	5.84	5.84	3.61	86.76	15.83	1.32	30.81	75%
LE9425B	8.06	59.260%	0.0%	59.3%	0.0%	35.00%	0.00016	360.000	4.77	4.77	0.27	6.60	1.20	0.21	13.64	75%
IA3-9-868	7.13	100.000%	0.0%	100.0%	0.0%	0.00%	0.00139	360.000	7.13	7.13	3.57	85.64	15.63	0.00	n/a	75%

PM Control Efficiency: 80.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	12.3	296	54.0	15.9
Controlled	12.3	296	54.0	3.19

METHODOLOGY

* The Maximum (unit/hr) may be higher than the number presented, but the gallons of material used on that part is lower. The number in this calculation is the maximum units per hour and gallons per unit resulting in the highest coating usage for the hour.

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 = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: TG Missouri Corporation
 Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
 Permit Number: MSOP 043-20232
 Plt ID: 043-00058
 Reviewer: CarrieAnn Paukowits
 Application Date: October 8, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % HDI	Weight % Formaldehyde	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
P15									
467W	9.27	0.01106	180.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
P16									
467W	9.27	0.00658	225.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
P17									
303LE35	7.78	0.00172	360.000	1.00%	0.00%	0.00%	0.21	0.00	0.21
LE9425B	8.06	0.00016	360.000	6.79%	0.27%	0.00%	0.14	0.01	0.14
IA3-9-868	7.13	0.00139	360.000	0.00%	0.00%	0.00%	0.00	0.00	0.00

Total State Potential Emissions **0.349 0.005 0.355**

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

**Appendix A: Emissions Calculations
Injection Molding**

**Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Plt ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004**

Material	Maximum pounds of resin per hour	Weight % VOC*	Weight % HAPs	Emission Factor (weight % of starting monomer emitted)	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per Year
Polypropylene resin pellets	450	1%	0%	3%	0.135	3.240	0.591
Totals:					0.135	3.24	0.591

Non-Open Molding Operations include the following: continuous lamination, pultrusion, marble casting, and closed molding.

METHODOLOGY

Potential VOC Pounds per Hour = Maximum pounds of resin per hour * Weight % of Monomer * Emission factor (weight % of starting monomer emitted)

Potential VOC Pounds per Day = Potential VOC Pounds per Hour * (24 hrs / 1 day)

Potential VOC Tons per Year = Potential VOC Pounds per Hour * (8760 hr/yr) * (1 ton / 2000 lbs)

Emission Factors for Marble Casting and Closed Molding are 3% for NVS and 2% for VS.

* This material contains a negligible amount of VOC. 1% is used for conservatism.

Other materials:

Expected Usage of Each material (cans/week)	Content of can (lbs/can)	Safety Factor	Maximum Usage (lbs/yr)
1	1	2	145.6

Material	Maximum pounds per year	Weight % VOC	Weight % Trichloroethylene	Tons of VOC per Year	Tons of Trichloroethylene per Year
Mold release	145.6	99%	0%	0.072	0.000
Cleaner/degreaser	145.6	97%	75%	0.071	0.055
Rust preventive	145.6	100%	85%	0.073	0.062
Totals:				0.215	0.116

METHODOLOGY

Maximum Usage (lbs/yr) = Expected usage (cans/week) * Content of can (lbs/can) * Safety Factor * 7 total days per week / 5 actual days per week * 52 weeks

Potential VOC Tons per Year = Maximum pounds per year * Weight % VOC / 2,000 lbs/ton

Potential HAP (Trichloroethylene) Tons per Year = Maximum pounds per year * Weight % HAP / 2,000 lbs/ton

Totals:

VOC (tons/yr)	HAP (tons/yr)
0.807	0.116

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: TG Missouri Corporation
Address City IN Zip: 5331 Foundation Blvd., New Albany, IN 47150
Permit Number: MSOP 043-20232
Pit ID: 043-00058
Reviewer: CarrieAnn Paukowits
Application Date: October 8, 2004**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0.000	0.000
Metal Inert Gas (MIG)(carbon steel)	1	13		0.0055	0.0005			0.072	0.007	0.000	0.000	0.007
Stick (E7018 electrode)	1	13		0.0211	0.0009			0.274	0.012	0.000	0.000	0.012
Tungsten Inert Gas (TIG)(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
Oxyacetylene(carbon steel)	0			0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	15	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	150	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.346	0.018	0.000	0.000	0.018
Potential Emissions lbs/day								8.30	0.437	0.00	0.00	0.437
Potential Emissions tons/year								1.51	0.080	0.00	0.00	0.080

METHODOLOGY

Calculations are conservative since these are maintenance welders and are seldom used.

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb