



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 26, 2004
RE: Key Plastics, LLC / 009-20328-00018
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 1/10/05



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

Mitchell E. Daniels, Jr.
Governor

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Commissioner

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January 26, 2005

Mr. Dean Brown
Key Plastics, LLC
1615 W. McDonald Street
Hartford City, Indiana 47348

Re: 009-20328
First Significant Source Modification to
Part 70 Permit No.: 009-17595-00018

Dear Mr. Brown:

Key Plastics, LLC was issued a Part 70 permit on March 31, 2004, for the operation of painted automobile door handles production source. An application to modify the source was received by the Office of Air Quality (OAQ) on November 8, 2004. Pursuant to the provisions of 326 IAC 2-7-10.5, a significant source modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is as follows:

- (a) construction of one (1) clear paint coating booth, identified as Clear 1, with a maximum capacity of 10,800 units per hour, using an electrostatic air atomization spray equipment, and exhausting to one (1) stack S11.

The exhaust stream from the one (1) clear coat booth is sent through the water wash and then twenty percent (20%) of the exhaust stream is ducted to a thermal oxidizer exhausting to stack identified as S11 to control emissions of volatile organic compounds. Eighty percent (80%) of the exhaust stream is sent through the dry filters for overspray control.

The following construction conditions shall apply:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the one (1) clear paint coating booth, identified as Clear 1. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 Gaurav Shil, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3259, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments
GS / EVP

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



Mitchell E. Daniels, Jr.
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 Commissioner

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Key Plastics, LLC
 1615 W. McDonald Street
 Hartford City, Indiana 47348**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T009-17595-00018	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 31, 2004 Expiration Date: March 31, 2009

First Significant Source Modification No.:009-20328-00018	Pages Affected: 3 to 7, 29, 31 to 35 Page added: 41
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 26, 2005

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]
[326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Particulate [326 IAC 6-3-2(d)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.1.5 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.6 Record Keeping Requirements

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- D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic
Parts and Products [40 CFR Part 63, Subpart P][40 CFR 63.4481][40 CFR 63.4482]
- D.2.3 Best Available Control Technology (BACT) and Volatile Organic Compounds (VOCs)
[326 IAC 8-1-6]
- D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.2.5 PSD Minor Limit [326 IAC 2-2]
- D.2.6 Particulate Matter (PM) [40 CFR 52 Subpart P]
- D.2.7 Particulate Matter (PM) [326 IAC 6-3-2 (c)]
- D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.9 Volatile Organic Compounds (VOC)
- D.2.10 Volatile Organic Compounds (VOC)[326 IAC 8-1-2]
- D.2.11 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.2.12 Thermal Oxidizer Temperature
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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary multi-stage coating of painted automobile door handles/housing.

Responsible Official:	John W. Evans, Plant Manager
Source Address:	1615 W. McDonald Street, Hartford City, Indiana 47348
Mailing Address:	1615 W. McDonald Street, Hartford City, Indiana 47348
General Source Phone Number:	(765) 348-7300
SIC Code:	3714
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD ; Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) manual sample spray coating booth, installed in 1993, identified as EU22, with maximum capacity of 40 units per hour, utilizing electrostatic air atomized spray applications, with dry filters as controls, and exhausting through one (1) stack identified as Stack No.10.
- (b) A plastic parts washing and painting system, installed in 1993 and modified in 2004 including:
 - (1) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
 - (2) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour.
 - (3) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour.
 - (4) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
 - (5) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour, using an electrostatic air atomization spray equipment, and exhausting to one (1) stack S11.

The seven (7) automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls.

- (6) One (1) natural gas 8-inch Tube-O-Flame, located at Stage No.2, with a maximum heat input rate of 1.00 million British thermal units (MMBtu) per hour, and exhausting to one(1) stack identified as Stack No. 2.
- (7) One (1) natural gas 6-inch Tube-O-Flame, located at Stage No. 3, with a maximum heat input rate of 0.60 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 3.
- (8) One (1) natural gas dry-off oven with a maximum heat input rate of 0.60 MMBtu per hour, and exhausting to one (1) stack identified as No. 5.
- (9) One (1) natural gas fired prime bake oven with a maximum heat input rate of 0.80 MMBtu per hour.
- (10) One (1) natural gas fired final bake oven consisting of a radiant heating portion and a direct heating portion with maximum heat input rates of 0.40 MMBtu per hour and 0.80 MMBtu per hour, respectively.
- (11) One (1) natural gas fired regenerative thermal oxidizer, with maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the three (3) clear coat booths and the No.1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth is ducted to a thermal oxidizer exhausting to stack identified as Stack No. 11 to control emissions of volatile organic compounds. Process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units (MMBtu) per hour:
- (b) One (1) natural gas fired boiler, installed in 1993, with a maximum heat input rate of 0.84 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 9 [326 IAC 6-2].
- (c) One (1) natural gas fired air make-up unit, with a maximum heat input rate of 3.30 MMBtu per hour.
- (d) One (1) natural gas fired burner with a maximum heat input rate of 1.00 MMBtu per hour which preheats fresh air coming into the air recirculation house.
- (e) One (1) natural gas fired make-up unit with a maximum heat input rate of 0.26 MMBtu per hour.
- (f) Ten (10) radiant tube heaters firing natural gas, each with a maximum heat input rate of 0.13 MMBtu per hour, and respectively exhausting to stacks identified as Stacks Nos. 12A through 12J.

- (g) One (1) natural gas fired space heater with a maximum heat input rate 0.10 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 14.
- (h) One (1) natural gas fired HVAC system with a maximum heat input rate of 0.35 MMBTU per hour firing natural gas, and exhausting to one (1) stack identified as Stack No. 14.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

A plastic parts washing and painting system, installed in 1993 and modified in 2004 including:

- (a) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
- (b) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour.
- (c) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour.
- (d) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
- (e) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11.

The seven (7) automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls.

- (f) One (1) natural gas 8-inch Tube-O-Flame, located at Stage No.2, with a maximum heat input rate of 1.00 million British thermal units (MMBtu) per hour, and exhausting to one(1) stack identified as Stack No. 2.
- (g) One (1) natural gas 6-inch Tube-O-Flame, located at Stage No. 3, with a maximum heat input rate of 0.60 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 3.
- (h) One (1) natural gas dry-off oven with a maximum heat input rate of 0.60 MMBtu per hour, and exhausting to one (1) stack identified as No. 5.
- (i) One (1) natural gas fired prime bake oven with a maximum heat input rate of 0.80 MMBtu per hour.
- (j) One (1) natural gas fired final bake oven consisting of a radiant heating portion and a direct heating portion with maximum heat input rates of 0.40 MMBtu per hour and 0.80 MMBtu per hour, respectively.
- (k) One (1) natural gas fired regenerative thermal oxidizer, with maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the three (3) clear coat booths and the No.1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth is ducted to a thermal oxidizer exhausting to stack identified as Stack No. 11 to control emissions of volatile organic compounds. Process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds. One(1)natural gas 8-inch Tube-O-Flame, located at Stage No.2, with a maximum heat input rate of 1.00 million British thermal units (MMBtu) per hour, and exhausting to stack identified as Stack No. 2.

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

D.2.3 Best Available Control Technology (BACT) and Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and OP No. T009-7508-00018, issued on January 12, 1999 and revised through this Title V renewal:

- (a) The regenerative thermal oxidizer and the fans moving the exhaust fumes from the six (6) automated coating booths of the plastic parts painting system, the prime bake oven and the final bake oven to the thermal oxidizer shall be in operation at all times that one of the six (6) automated coating booths, the prime bake oven or the final bake oven is operated, and that the water curtain and dry filters that control particulate matter emissions shall be operating and in place at all times that the system is in operation.
- (b) The fans shall operate within a fan amperage and the regenerative thermal oxidizer shall operate above a minimum operating temperature, as determined by the most recent test, that is demonstrated to achieve 80.75% overall control efficiency of the volatile organic compounds (VOC) emitted from the parts being coated and baked.
- (c) The regenerative thermal oxidizer and air recirculation system shall continue to be operated after the painting operations cease for at least the minimum period of time, as determined by the most recent test, demonstrated to purge the recirculation air system's residual VOC content through the thermal oxidizer and reduce the VOC concentration in the recirculated air to ambient levels.
- (d) The input of VOC to the plastic parts painting system and the usage of cleanup solvent for the plastic parts painting system shall be limited to 1,164 tons used per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the plastic parts painting system being greater than 224.4 tons per year. This limitation is based upon the use of a regenerative thermal oxidizer with an overall control efficiency of 80.75%.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to the applicator of the clear paint coating booth, identified as Clear 1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.2.5 PSD Minor Limit [326 IAC 2-2]

Pursuant to OP T009-7508-00018, issued on January 19, 1999, the use of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than 250 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 VOC to less than 250 tons per twelve (12) consecutive month period and is a condition of operation of this facility. Therefore, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not shield the Permittee from possible enforcement actions initiated by either the U.S. EPA or the Indiana Department of Environmental Management (IDEM) involving this facility. Compliance with the terms of this permit does not serve as proof of compliance for the facility described above. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such outstanding issue.

D.2.6 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to Part 70 No. T009-7508-00018, issued on January 12, 1999, and 40 CFR 52 Subpart R, the particulate matter (PM) from the six (6) coating booths of the plastic parts painting system and the one (1) manual sample coating booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.7 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to Part 70 No. T009-7508-00018 issued on January 12, 1999, and 326 IAC 6-3-2(d), particulate from the one (1) manual sample coating booth and seven (7) coating booths of the plastic parts painting system shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate each 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.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.3, D.2.4, and D.2.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.2.1.

D.2.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.2.3 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Pursuant to 40 CFR 63, Subpart PPPP, if the Permittee elects to demonstrate compliance using 63.4510, 63.9(b), 63.9(h), 63.4881(d), 63.4481(e)(2) performance testing must be conducted in accordance with 40 CFR 63, Subpart PPPP.

D.2.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three-hour (3-hr) average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour (3-hr) average temperature of the thermal

oxidizer is below 1400 °F. A three-hour (3-hr) average temperature that is below 1400 °F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour (3-hr) average temperature of the thermal oxidizer is below the three-hour (3-hr) average temperature as observed during the compliant stack test. An hourly average temperature that is below the three-hour (3-hr) average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.2.1, as approved by IDEM.

D.2.13 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.2.3, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.2.14 Particulate Matter (PM)

Pursuant to OP No. T009-7508-0001, issued on January 12, 1999, and in order to comply with condition D.2.7, the dry filters for PM control shall be in place and operating at all times when the seven (7) automated spray booths are in operation.

D.2.15 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the manual sample spray coating booth stack (No. 10) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.16 Record Keeping Requirements

- (a) To document compliance with conditions D.2.3, D.2.4, D.2.5, D.2.12 and D.2.13, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.2.3, D.2.4 and D.2.5.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
 - (5) The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the duct pressure or fan amperage.
- (c) To document compliance with Condition D.2.8, 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.2.17 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

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

D.2.18 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

- (a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
- (b) Records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.2.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.3, D.2.4 and D.2.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.20 Reporting Requirements [40 CFR 63.4520]

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

D.2.21 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

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

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

FESOP Quarterly Report

Source Name: Key Plastics, LLC
Source Address: 1615 W. McDonald Street, Hartford City, Indiana 47348
Mailing Address: Same as above
Part 70 Permit No.: T009-17595-00018
Facility: Clear paint coating booth, identified as Clear 1
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month	Total VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Key Plastics, LLC
Source Location:	1615 W. McDonald Street, Hartford City, Indiana 47348
County:	Blackford
SIC Code:	3714
Operation Permit No.:	T009-17595-00018
Operation Permit Issuance Date:	March 31, 2004
Significant Source Modification No.:	009-20328-00018
Significant Permit Modification No.:	009-19881-00018
Permit Reviewer:	Gaurav Shi/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit modification application from Key Plastics, LLC relating to the construction and the operation of the following emission unit:

- (a) A plastic parts washing and painting system, installed in 1993 and modified in 2004 including:
 - (1) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour, using an electrostatic air atomization spray equipment, and exhausting to one (1) stack S11.

The exhaust stream from the one (1) clear coat booth is sent through the water wash and then twenty percent (20%) of the exhaust stream is ducted to a thermal oxidizer exhausting to stack identified as S11 to control emissions of volatile organic compounds. Eighty percent (80%) of the exhaust stream is sent through the dry filters for overspray control.

Explanation of Modification Requested

On November 8, 2004, Key Plastics, LLC submitted a request to add one (1) clear paint coating booth to the existing painting system. The new booth is a clear coat booth and will be added upstream (or into the first position) of the existing two clear coat booths (Clear 1 and Clear 2). The Permittee requested to re-number the clear coat booths i.e. Clear 1 to be renamed to Clear 2 and Clear 2 to be renamed to Clear 3. The exhaust from the additional coating application booth will be ducted to the existing Regenerative Thermal Oxidizer through the air recirculation system as with other booths in the paint system. The additional coating application booth will increase the production capacity of the coating application line and will increase the actual VOC emission rate of the process line. However, the Permittee shall comply with allowable VOC emission rate of 250 tons per consecutive twelve (12) month period as specified by Part 70 Permit no. 009-17595-00018. The VOC input to the new clear paint coating booth shall be limited to less than 25 tons per year to render 326 IAC 8-1-6 not applicable.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) T009-17595-00018 issued on March 31, 2004

Enforcement Issue

There are no enforcement actions with the equipment proposed in the modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
S11	Clear Paint Coating Booth (Clear 1)	30	40	16759	300

Recommendation

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

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

An application for the purposes of this review was received on November 8, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 through 3).

Potential To Emit Before Controls (Modification)

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

Pollutant	Potential To Emit (tons/year)
PM	92.69
PM-10	92.69
SO ₂	0.00
VOC	133.2
CO	0.00
NO _x	0.00
HAPs	118.67

Justification for Modification

The Title V permit is being modified through a Significant Source Modification and Significant Permit Modification. This modification has a potential to emit greater than ten (10) tons per year (86.31 tons per year) of a single hazardous air pollutant (Xylene) and twenty-five (25) tons per year of combined hazardous air pollutants. Therefore, pursuant to 326 IAC 2-7-10.5 (f)(6) the modification shall be processed in accordance with the procedures in 326 IAC 2-7-10.5 (g).

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Blackford County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Less than 250
VOC	Less than 250
CO	Less than 250
NOx	Less than 250

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

- (b) These emissions are based upon the technical support document for Part 70 No. 009-17595-00018.

Potential to Emit After Controls for the Modification

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

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Clear Paint Booth, Clear 1	1.85	1.85	-	<25	-	-	16.61	22.84
Total Modification Emissions	1.85	1.85	-	<25	-	-	16.61	22.84
PSD Significant Modification Thresholds	250	250	250	250	250	250	N/A	N/A

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.720, Subpart TTT), Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines are not included in the permit for the one (1) clear paint coating booth, identified as Clear 1, because in this booth plastic parts are not processed for use in the manufacture of business machines, as defined in 40 CFR 60.721. Clear 1 is part of a plastic parts painting system to produce painted automobile door handles.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastics Parts Surface Coating 40 CFR Part 63, Subpart PPPP and 326 IAC 20-1-1 are included in the permit because the source conducts surface coating of plastics parts of automobile door handles; and is a major source of hazardous air pollutants. The entire coating line, including the new clear coat booth, shall be subject to the requirements of 40 CFR Part 63, Subpart PPPP.

Pursuant to 40 CFR 63.4481, the affected source is defined to include the collection of all coating operations and supporting equipment in one of the subcategories in 40 CFR 63.4481(a). Pursuant to 40 CFR 63.4481(c), a new affected source is defined one that meets the criteria in (i) below and the criteria in either (ii) or (iii) below:

- (i) The source commenced construction on or after December 4, 2002 by installing new coating equipment.
- (ii) The new coating equipment is used to coat plastic parts and products at a source where no plastic parts surface coating was previously performed.
- (iii) The new coating equipment is used to perform plastic parts and products coating in a subcategory that was not previously performed.

Since the new coating booth will be part of an existing coating plastic parts coating process and will coat the same parts as the remaining booths, the new booth does not meet the criteria to be a new affected source.

A reconstructed affected source is defined by the NESHAP General Provisions in 40 CFR 63.2 as the replacement of components of an affected or a previously nonaffected source to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source and it is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator pursuant to Section 112 of CAA. Nothing is being replaced by the addition of the new booth and the cost of addition of one new booth would not constitute 50% of the cost of building a seven-booth coating line and supporting equipment. Therefore, the modification does not meet the definition of a reconstructed affected source.

Pursuant to 40 CFR 63.4482 (e), an affected source is existing if it is not new affected source or reconstructed affected source. The following requirements are included in the permit for the coating line, including the new booth:

- (1) Pursuant to 326 IAC 20-1, 40 CFR Part 63, Subpart A, Table 12 to 40 CFR Part 63, Subpart P, and 40 CFR 63.2398] (General Provisions Relating to HAPs), The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (2) Pursuant to 40 CFR Part 63, Subpart P, 40 CFR 63.4481, 40 CFR 63.4482 (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products),
 - (A) the provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart P.
 - (B) This subpart applies is the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:
 - (i) general use coating subcategory
 - (ii) automotive lamp coating subcategory
 - (iii) TPO coating subcategory
 - (iv) assembled on-road vehicle coating subcategory
 - (v) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

- (3) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (A) All coating operations as defined in 40 CFR 63.4581;
 - (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (4) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

Pursuant to 40 CFR 63.4510 (Notification Requirements),

- (A) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to The Permittee by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (B) **Initial notification.** The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (C) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

Pursuant to [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)] (Record Keeping Requirements),

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

standard.

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

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

Pursuant to 326 IAC 2-7-12 and 326 IAC 2-7-5 (Requirement to Submit a Significant Permit Modification Application), the Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

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

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

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

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

- (c) A pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC at this source shall be subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring, if the following three criteria are met:

- (1) the potential to emit before controls equal to or greater than one hundred (100) tons per year of VOC;
- (2) is subject to an emission standard for VOC and has a control device that is necessary to meet that limit;
- (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The new clear paint coating booth has uncontrolled potential to emit of VOC greater than 100 tons per year and has control device to meet the emission standard for VOC. However, the emission unit, as PSEU, are not subject to the CAM rule. Pursuant to 40

CFR 64.2(b)(1)(i), *Exemptions*, the requirements of this rule do not apply to any emission limit or standard proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. The new booth is subject to the requirements of 40 CFR 63, Subpart PPPP, which is section 112 emission standard established after November 15, 1990. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, do not apply to this PSEU.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This existing source is a minor stationary source because it is not one of the 28 listed source categories under 326 IAC 2-2, and potential emissions of the regulated pollutants from the source are less than 250 tons per year. Pursuant to Part 70 permit no. 009-17595-00018, issued on March 31, 2004, the source accepted PSD minor limit of 250 tons per year on VOC usage. The current source wide PSD avoidance limit shall be expanded to include the new clear paint booth. Therefore, the overall source wide VOC usage limit will remain below the major source thresholds for PSD after the new booth is brought online. Since the potential VOC emissions from this modification will be less than 250 tons per year and the source shall comply with the allowable emission limit of 250 tons per year VOC for existing and proposed sources, the requirements of 326 IAC 2-2 shall not apply.

State Rule Applicability – Individual facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

Clear Paint Coating Booth, identified as Clear 1

The Permittee accepted source wide PSD minor limit of 250 tons per year on VOC usage. The VOC usage for the new booth will be less than 250 tons per year. The existing permit limits are not affected due to this modification. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-4-1.1 (New Source Toxics Control)

Pursuant to the discussion above for 40 CFR Part 63, Subpart PPPP applicability, an affected source is existing if it is not new affected source or reconstructed affected source. The coating line, including the Clear 1 coating booth is regulated as an existing source. Therefore, 326 IAC 2-4.1 will not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) for surface coating
Particulate from the surface coating operations at the clear paint coating booth, identified as Clear 1, shall be controlled by a dry particulate filter, 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:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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.

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

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year, not regulated by other provisions of Article 8. The potential VOC emissions from the new spray booth at the existing plastic parts painting process to produce painted automobile door handles shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 shall not apply to this modification.

Compliance Requirements

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

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

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T009-17595-00018).

1. Section A.2, Emission Units and Pollution Control Equipment Summary and the Section D.2 facility description box are revised to reflect the addition of the new clear painting booth and the description changes:

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

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

- (a) One (1) manual sample spray coating booth, installed in 1993, identified as EU22, with maximum capacity of 40 units per hour, utilizing electrostatic air atomized spray applications, with dry filters as controls, and exhausting through one (1) stack identified as Stack No.10.
- (b) A plastic parts washing and painting system, installed in 1993 **and modified in 2004** including:
 - (1) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
 - (2) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour.
 - (3) One (1) prime paint coating booth with a maximum capacity of 10,800 units per

hour.

- (4) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
- (5) **One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11.**

The ~~six (6)~~ **seven (7)** automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls.

.....

- (11) One (1) natural gas fired regenerative thermal oxidizer, with maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the ~~two (2)~~ **three (3)** clear coat booths and the No.1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth is ducted to a thermal oxidizer exhausting to stack identified as Stack No. 11 to control emissions of volatile organic compounds. Process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

A plastic parts washing and painting system, installed in 1993 **and modified in 2004** including:

- (a) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
- (b) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour.
- (c) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour.
- (d) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another.
- (e) **One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11.**

The ~~six (6)~~ **seven (7)** automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls.

.....

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

-
- (k) One (1) natural gas fired regenerative thermal oxidizer, with maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the ~~two (2)~~ **three (3)** clear coat booths and the No.1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams form the prime coat booth, pearl coat booth, and No. 2 base coat booth is ducted to a thermal oxidizer exhausting to stack identified as Stack No. 11 to control emissions of volatile organic compounds. Process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds. One(1)natural gas 8-inch Tube-O-Flame, located at Stage No.2, with a maximum heat input rate of 1.00 million British thermal units (MMBtu) per hour, and exhausting to stack identified as Stack No. 2.

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

2. Conditions D.2.4 and D.2.9, Volatile Organic Compounds, are included in the permit for the clear paint coating booth to preclude the requirements of 326 IAC 8-1-6, New Facilities: General Reduction Requirements. The subsequent condition numbers are revised due to these additions:

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to the applicator of the clear paint coating booth, identified as Clear 1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.3, D.2.4, and D.2.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

3. Condition D.2.6, Particulate [326 IAC 6-3-2 (d)], is revised to include the new clear paint coating booth and the recent rule requirements. Pursuant to this modification, Condition D.2.6 is now designated as D.2.7:

D.2.67 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to Part 70 No. T009-7508-00018 issued on January 12, 1999, and 326 IAC 6-3-2(d), particulate from the one (1) manual sample coating booth **and seven (7) coating booths of the plastic parts painting system** shall be controlled by a dry particulate filter, **waterwash, or an equivalent control device**, and ~~particulate from the six (6) coating booths of the plastic parts painting system shall be controlled by water wash and/or dry filters,~~ and the Permittee shall operate each control device in accordance with manufacturer's specifications. ~~This requirement to operate the control is not federally enforceable.~~

(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.**
4. Condition D.2.12, Particulate Matter (PM), is revised to include the new clear paint coating booth. Pursuant to this modification, Condition D.2.12 is now designated as D.2.14:

D.2.14 Particulate Matter (PM)

Pursuant to OP No. T009-7508-0001, issued on January 12, 1999, **and in order to comply with condition D.2.7**, the dry filters for PM control shall be in place and operating at all times when the ~~six~~ **seven (67)** automated spray booths are in operation.

5. Condition D.2.14, Record Keeping Requirements, is revised to include the recent condition references. Pursuant to this modification, Condition D.2.14 is now designated as D.2.16:

D.2.16 Record Keeping Requirements

- (a) To document compliance with conditions D.2.3, D.2.4, **D.2.5**, ~~D.2.4012~~ and ~~D.2.4413~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions ~~D.2.3 and D.2.4~~, **and D.2.5**.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage.
 - (4) The total VOC usage for each month.
 - (5) The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the duct pressure or fan amperage.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain of 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.

6. Condition D.2.17, Reporting Requirements, is revised to include reporting in order to document compliance with VOC usage limit of 24 tons per twelve (12) consecutive month period for the new clear paint coating booth. Pursuant to this modification, Condition D.2.17 is now designated as D.2.19. FESOP quarterly report form is also included in the permit document for the new clear paint coating booth in order to comply with the VOC usage limit.

D.2.1719 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.3 ~~and~~ D.2.4, **and D.2.5** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Conclusion

The construction and operation of clear paint coating booth shall be subject to the conditions of the attached proposed Significant Source Modification No.:009-20328-00018 and Significant Permit Modification No.: 009-19881-00018.

Appendix A: Emission Calculations

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
Part 70 SSM No.: 009-20328-00018
Plt ID: 009-00018
Reviewer: GS/EVP
Date: 1/26/05

Uncontrolled Potential Emissions (tons/year) (including modification)

Emissions Generating Activity			
Pollutant	Surface Coating Emissions	Natural Gas Combustion	TOTAL
PM	484.65	0.10	484.8
PM10	484.65	0.50	485.2
SO2	0.00	0.00	0.0
NOx	0.00	6.90	6.9
VOC	811.83	0.40	812.2
CO	0.00	5.80	5.8
Total Combined HAPs	390.71	0.13	390.8
Worst case single HAP	86.31	0.12	
Total emissions based on rated capacity at 8,760 hours/year.			

Controlled Potential Emissions (tons/year) (including modification)

Emissions Generating Activity			
Pollutant	Surface Coating Emissions	Natural Gas Combustion	TOTAL
PM	9.69	0.10	9.8
PM10	9.69	0.50	10.2
SO2	0.00	0.00	0.0
NOx	0.00	6.90	6.9
VOC	137.61	0.40	138.0
CO	0.00	5.80	5.8
Total Combined HAPs	67.73	0.13	67.9
Worst case single HAP	16.61	0.12	
Total emissions based on rated capacity at 8,760 hours/year, after control.			

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

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
Part 70 SSM No.: 009-20328-00018
Plt ID: 009-00018
Reviewer: GS/EVP
Date: 1/26/05

Material/Facility	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		
Clear Booth	8.4	46.30%	0.0%	46.3%	0.0%	45.30%	0.000724	10800	3.89	3.89	30.41	729.85	133.20	92.69	8.59	40%		
State Potential Emissions											30.41	729.85	133.20	92.69				
Controlled Potential Emissions													25.64	1.85				

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used

NOTES

Controlled Potential Emission for VOC calculated using 80.75% overall control efficiency
 Controlled Potential Emission for particulate calculated using 98% control efficiency

Appendix A: Emission Calculations

HAP Emission Calculations

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
Part 70 SSM No.: 009-20328-00018
Plt ID: 009-00018
Reviewer: GS/EVP
Date: 1/26/05

Material/Facility	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Clear Booth	8.4	0.000724	10800.00	30.00%	10.00%	1.25%	0.00%	86.31	28.77	3.60	0.00

Unrestricted Single Worst Case	86.31
Controlled Single Worst Case	16.61
Unrestricted Combined Total Emission	118.67
Controlled Combined Total Emission	22.84

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