



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: August 10, 2005

RE: GDX Automotive North America, Inc. / 169-21488-00004

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

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 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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August 10, 2005

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

Re: 169-21488
Fifth Administrative Amendment to
Part 70 Permit No. 169-5650-00004

Dear Mr. Shepherd:

GDx Automotive North America, Inc. (formerly known as GenCorp Inc., dba GDx Automotive, Inc.) was issued a Part 70 Permit on April 15, 2002, for a stationary rubber and plastic parts manufacturing operation. A letter requesting a permit amendment to remove two (2) operations and add one (1) insignificant coating operation was received on July 19, 2005.

GDx Automotive North America, Inc. requests to add one (1) coating operation at their existing facility known as inserts coating operation. Based on the information provided by the source, this new coating operation will have potential VOC, single HAP, and total HAPs emissions of 0.47, 0.30 and 0.40 tons per year, respectively, (See Appendix A, Emission Calculations, one (1) page). IDEM, OAQ has determined that the potential emissions increase from this modification is at exemption level. Therefore, this addition of a new surface coating booth CO5 is being performed through an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8)(B) because it is a revision that incorporates an insignificant activity as defined in 326 IAC 2-7-1(21). Also, this operation is exempt from the requirements of 326 IAC 6-3 since the coating usage is less than 5 gallons per day.

In addition, GDx Automotive North America, Inc. requests to remove two (2) existing operations from the facility and the permit including Line 8 plastic parts adhesive prep station (currently listed as item (l) in Section A.2 of the permit) and the below belt coating operation (currently listed as item (o) in Section A.2 of the permit).

Pursuant to the current source request and the provisions of 326 IAC 2-7-11(a)(8), the permit is hereby administratively amended to remove two (2) existing operations and add one (1) insignificant coating operation. Sections A.2, A.3 and D.2 of the Part 70 permit are administratively amended as follows (bolded language has been added and the language with a line through it has been deleted):

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:

- ~~(l) Line 8 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L8-1;~~
- ~~(m) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;~~
- ~~(n) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft² of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);~~
- ~~(o) One (1) below belt coating operation consisting of:
 - ~~(1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack BB-1, and~~
 - ~~(2) Three (3) electric IR ovens exhausting to stack BB-2.~~~~

A.3 Specifically Regulated 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):

- (b) Other activities or categories not previously identified with a potential to emit less than significant levels:
 - (1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2(c)] (covered under C.1)
 - (2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2(c)] covered under C.1)
 - (3) P207 Finishing area 239, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2(c)] (covered under C.1)
 - (4) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2(c)] (covered under C.1)
 - (5) Two (2) Barwell Extruders, exhausting inside the building; [326 IAC 6-3-2(c)] (covered under C.1) and
 - (6) Plug Presses and RCT Operations. [326 IAC 6-3-2(c)] (covered under C.1)
 - (7) One (1) topcoat booth at Line 1, using a maximum 12.4 pounds of coating per day, exhausting to stack No. L1-7a
 - (8) One (1) inserts coating operation using less than 5 gallons per day of coating.**

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;
- (k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);
- ~~(l) Line 8 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L8-1;~~
- ~~(m) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;~~
- ~~(n) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft² of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);~~
- ~~(o) One (1) below belt coating operation consisting of:
 - ~~(1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack BB-1, and~~
 - ~~(2) Three (3) electric IR ovens exhausting to stack BB-2.~~~~

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

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

- (a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:
 - (1) Line 3 Extruders;
 - (2) Line 4 Extruders;
 - (3) Line 5 Extruder;
 - (4) Line 6 Extruders;
 - (5) HVLP Honda Coating Booth
 - (6) Department 350 RCT brush application;
 - (7) Line 4 topcoat spray booth;
 - ~~(8) U152 (below belt) Coating Booth;~~
 - (9)** Line 3 adhesive application booth; **and**
 - ~~(10) Line 8 adhesive prep application booth; and~~
 - ~~(11) Line 9 adhesive prep application booth.~~

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Line 1 On-Line topcoat spray booth, Line 2 On-Line HVLP spray booth, Line 4 topcoat spray booth, **and** Finishing Area 239 HVLP coating operation ~~and the U152 (below belt) Coating Booth~~ shall not exceed allowable PM emission rate based on the following equation:

D.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

- (a) Any change or modification which may increase potential usage of VOC for each of the
- (1) Banbury Mills and Mixers;
 - (2) Line 1 Extruders;
 - (3) Line 2 Extruders;
 - (4) Line 3 Extruders;
 - (5) Line 4 Extruders;
 - (6) Line 5 Extruder;
 - (7) Line 6 Extruders;
 - (8) HVLP Honda Coating Booth
 - (9) Department 350 RCT brush application;
 - (10) Line 4 topcoat spray booth;
 - ~~(11) U152 (below belt) Coating Booth;~~
 - (12) Line 1 On-Line topcoat spray booth;
 - ~~(13) Line 3 adhesive application booth; and~~
 - ~~(14) Line 8 adhesive prep application booth; and~~
 - (15) Line 9 adhesive prep application booth;

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, **and** one (1) Line 4 topcoat spray booth, ~~and one (1) below belt spray coating booth, identified as U152~~), at all times that the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the one (1) HVLP coating operation for Finishing Area 239, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, **and** one (1) HVLP coating operation for Finishing Area 239, ~~and one (1) below belt spray coating booth, identified as U152~~), are in operation.

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, **and** one (1) Line 4 topcoat spray booth, ~~and one (1) below belt spray coating booth, identified as U152~~) stacks 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Adeel Yousuf, at (973) 575-2555, ext. 3252 or dial
(800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original Signed By:
Nysa James, Section Chief
Permits Branch
Office of Air Quality

Attachments
AY / EVP

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



Mitchell E. Daniels, Jr.
 Governor

Thomas W. Easterly
 Commissioner

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**GDX Automotive North America, Inc.
 One General Street
 Wabash, Indiana 46992**

(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.: T169-5650-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 15, 2002. Expiration Date: April 15, 2007.

- First Administrative Amendment (169-16057-00004), issued on June 10, 2002
- Second Administrative Amendment (169-17150-00004), issued on May 8, 2003
- First Significant Permit Modification (169-17370-00004), issued on December 29, 2003
- Third Administrative Amendment (169-19567-00004), issued on September 20, 2004
- First Minor Permit Modification (169-19267-00004), issued on October 13, 2004
- Fourth Administrative Amendment (169-20170-00004), issued on October 19, 2004

Fifth Administrative Amendment 169-21488-00004	Pages Affected: 6, 7, 31, 32, and 33
Issued by: Original Signed By: Nysa James, Section Chief Office of Air Quality	Issuance Date: August 10, 2005

- (d) Extrusion Line 2, consisting of the following:
 - (1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
 - (2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8);
 - (3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (L2-9);
 - (4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (L2-1 and 2)

- (e) Extrusion Line 3, consisting of the following:
 - (1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
 - (2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents L3-1 through L3-5; and
 - (3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.

- (f) Extrusion Line 4, consisting of the following:
 - (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
 - (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
 - (3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

- (g) Extrusion Line 5, constructed in 1989, consisting of:
 - (1) One (1) Line 5 extruder with a total maximum capacity of 1000 pounds of extruded rubber per hour;
 - (2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (L5-1 through L5-10); and
 - (3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

- (h) Extrusion Line 6, constructed in 1978 and 1985, consisting of two (2) extruders and one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2);

- (i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

- (j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;

- (k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);

- (l) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;
- (m) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft² of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);

A.3 Specifically Regulated 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) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2(c)] (covered under C.1)
- (b) Other activities or categories not previously identified with a potential to emit less than significant levels:
 - (1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2(c)] (covered under C.1)
 - (2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2(c)] (covered under C.1)
 - (3) P207 Finishing area 239, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2(c)] (covered under C.1)
 - (4) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2(c)] (covered under C.1)
 - (5) Two (2) Barwell Extruders, exhausting inside the building; [326 IAC 6-3-2(c)] (covered under C.1) and
 - (6) Plug Presses and RCT Operations. [326 IAC 6-3-2(c)] (covered under C.1)
 - (7) One (1) topcoat booth at Line 1, using a maximum 12.4 pounds of coating per day, exhausting to stack No. L1-7a
 - (8) One (1) inserts coating operation using less than 5 gallons per day of coating.
- (c) One (1) natural gas boiler with maximum rating of 2.93 MMBtu/hr; providing process heat to the salt bath lines at the plant (Lines 4 and 6).

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).

- (j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;
- (k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);
- (l) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;
- (m) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft² of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

- (a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:
 - (1) Line 3 Extruders;
 - (2) Line 4 Extruders;
 - (3) Line 5 Extruder;
 - (4) Line 6 Extruders;
 - (5) HVLP Honda Coating Booth
 - (6) Department 350 RCT brush application;
 - (7) Line 4 topcoat spray booth;
 - (8) Line 3 adhesive application booth; and
 - (9) Line 9 adhesive prep application booth.
- (b) Single HAP and total HAPs usages for each of the following HAPs emitting facilities:
 - (1) Line 5 adhesive application booth; and
 - (2) Line 7 adhesive application booth.

shall be limited, to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Line 1 On-Line topcoat spray booth, Line 2 On-Line HVLP spray booth, Line 4 topcoat spray booth, and Finishing Area 239 HVLP coating operation shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 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.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

- (a) Any change or modification which may increase potential usage of VOC for each of the
- (1) Banbury Mills and Mixers;
 - (2) Line 1 Extruders;
 - (3) Line 2 Extruders;
 - (4) Line 3 Extruders;
 - (5) Line 4 Extruders;
 - (6) Line 5 Extruder;
 - (7) Line 6 Extruders;
 - (8) HVLP Honda Coating Booth
 - (9) Department 350 RCT brush application;
 - (10) Line 4 topcoat spray booth;
 - (11) Line 1 On-Line topcoat spray booth;
 - (12) Line 3 adhesive application booth; and
 - (13) Line 9 adhesive prep application booth;

to greater than 25 tons per year, before add-on controls, shall require OAQ's prior approval before such change can take place.

- (b) VOC usage shall be limited, to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply, in the following:
- (1) Line 1 adhesive application booth;
 - (2) Line 2 booths (two(2) HVLP spray booths and one (1) adhesive booth);
 - (3) Line 5 adhesive application booth; and
 - (4) Line 7 adhesive application booth.

These usage limits will limit VOC emissions to less than 25 tons per year for each of the facilities listed above. Therefore, the requirements of 326 IAC 8-1-6 do not apply. The VOC usage limits shall also limit source wide VOC emissions to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

- (c) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the extruded rubber flocking for Line 5, HVLP coating operations (P207 Finishing Area 239 Primer Booth and insignificant P207 topcoat booths) and wipe /cleaning (Finishing Area 239) shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this facility is:
- (1) Drip and wipe method for extruded rubber flocking;
 - (2) Wipe method for extruded rubber wipe/cleaning; and
 - (3) HVLP application method for spray coating of primer and decorative topcoat.

D.2.4 Nonapplicable Construction Permit Requirements

The requirements from:

- (a) Construction Permit (169-1993-00004), issued on September 6, 1991, Condition 4, listing requirements pursuant to 326 IAC 2-3;

- (b) Construction Permit (169-4072-00004), issued on February 13, 1995, Condition 5, listing requirements pursuant to 326 IAC 2-3;
- (c) Amendment (169-11456-00004), issued on November 4, 1999 and the new operation condition #5 of [CP 169-4072-00004], listing requirements pursuant to 326 IAC 2-2 and 40 CFR 52.21;

are not applicable because IDEM, OAQ has determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential to emit VOC from the source is less than 250 tons per year and is a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

D.2.5 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 any control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) and Hazard Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.2.1 and D.2.3(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.7 VOC and HAPs Emissions

Compliance with Conditions D.2.1 and D.2.3(a) and (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage at each facility for the most recent twelve (12) month period.

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

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, and one (1) Line 4 topcoat spray booth, at all times that the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the one (1) HVLP coating operation for Finishing Area 239, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, and one (1) HVLP coating operation for Finishing Area 239), are in operation.

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, and one (1) Line 3 topcoat spray booth) stacks 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

**Appendix A: Emission Calculations
Insignificant Activity**

**Company Name: GDX Automotive North America, Inc.
Address City IN Zip: 1 General Street, Wabash, Indiana 46992
Permit No.: 169-21488-00004
Reviewer: Adeel Yousuf/EVP
Date: July 29, 2005**

Inserts Coating Operation (new booth)

Material	Density (lb/gal)	Maximum Usage (gal/yr)	VOC Content (lb/gal)	Potential emission rate (TPY)
Chemlok	7.95	155.4900	6.06	0.471
			Total VOC	0.471
HAPs		Potential VOC Emissions (TPY)	HAP Content (wt %)	Potential emission rate (TPY)
Xylene		0.47	65.00%	0.30615
Ethylbenzene		0.471	15.00%	0.07065
MDI		0.471	5.00%	0.02355
			Total HAPs	0.400