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Governor

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Commissioner

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TO: Interested Parties / Applicant
DATE: October 14, 2005
RE: H.A. Parts Products of Indiana / 133-21695-00041
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 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
FN-REGIS.dot 1/10/05

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	H.A. Parts Products of Indiana Company, Inc.
Source Location:	2200 State Road 240 East, Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3465, 3089
Operation Permit No.:	R 133-21695-00041
Permit Reviewer:	Jenny Acker

The Office of Air Quality (OAQ) has reviewed an application from H.A. Parts Products of Indiana Company, Inc. (HAPPICO) relating to the operation of a plastic automotive trim molding surface coating operation.

History

HAPPICO was issued a Part 70 Operating Permit (133-12660-00019) on March 19, 2002, for a stationary plastic automotive trim molding and surface coating operation. HAPPICO has transferred ownership of the operations to Chiyoda. However, HAPPICO will retain ownership of two (2) co-extrusion and flocking lines and will lease building space from Chiyoda. The co-extrusion and flocking operations are subject to New Source Review and a Registration will be issued.

Emission Units

The source consists of the following emission units:

Co-Extrusion

- (a) Two (2) co-extrusion lines, constructed in 1989, each utilizing a roller coating system for adhesive application, CX115 exhausting through E1, and CX111 exhausting through stack E3.

Flocking

- (b) Two (2) flockers for adhesive application, identified as FL101 and FL112, both constructed in 1989, each utilizing an air atomization spray application system, each equipped with one (1) infrared (IR) oven, with each flocker exhausting through one (1) stack, identified as F1 and F4, respectively, and each IR oven exhausting through one (1) stack, identified as F2 and F3, respectively.

Existing Approvals

This is the first air permit issued for this source.

Enforcement Issue

There are no enforcement issues pending.

Recommendation

The staff recommends to the Commissioner that the Registration 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 administratively complete application for the purposes of this review was received on August 23, 2005. Additional information was received on September 15, 2005.

Emission Calculations

See Appendix A, page 1 and 2, of this document for detailed emissions calculations.

Potential To Emit of the Source

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.84
PM-10	0.84
SO ₂	--
VOC	9.58
CO	--
NO _x	--

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
MEK	5.06
MIBK	3.04
Toluene	0.65
Methyl Methacrylate	0.01
Formaldehyde	Neg.
TOTAL	8.78

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each pollutant is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of the total HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.

- (c) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM-2.5	attainment
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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Putnam County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Putnam County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

NSPS

- (a) This source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.390, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations). This rule applies to affected facilities in an automobile or light-duty truck assembly plant. Exempt from this rule are operations used to coat plastic body components or all-plastic automobile or light duty truck bodies on separate coating lines. H.A. Part Products of Indiana Company coats plastic automobile trim, not vehicle bodies, and does not assemble automobiles or light-duty trucks, therefore, the requirements of 40 CFR Part 60.390, Subpart MM do not apply.

NESHAP

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Putnam County and is not required to have a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 (Emission Reporting) are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

The flockers have a combined usage less than 5 gallons per day. Pursuant to 326 IAC 6-3-2(d)(4), the flockers are exempt from the requirement of 326 IAC 6-3-2.

At any time the coating application is increased to greater than 5 gallons per day, control devices must be in place.

Pursuant to 326 IAC 6-3-1(b)(8), surface coating using roll coating is exempt from 326 IAC 6-3. Therefore, 326 IAC 6-3-2 does not apply to the co-extruders.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

For facilities constructed after November 1, 1980 and before July 1, 1990, this rule applies if potential VOC emissions are equal to or greater than 25 tons per year and if metal parts or products which fall under the Standard Industrial Classification (SIC) Code of major groups #33 through #39 are coated. The co-extrusion lines, both constructed in 1989, are not subject to the requirements of this rule because the potential to emit of VOC in the two (2) lines is less than 25 tons per year so that the requirements of this rule do not apply.

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

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of greater than or equal to 25 tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The co-extrusion lines are not subject to the requirements of this rule because the potential VOC emissions are less than 25 tons per year. The two (2) flockers are not subject to the requirements of this rule because potential VOC emissions are less than 25 tons per year.

Conclusion

The operation of this plastic surface coating operation shall be subject to the conditions of the

H.A. Parts Products of Indiana Company, Inc.
Greencastle, Indiana
Permit Reviewer: Jenny Acker

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attached proposed **Registration Permit No. R133-21695-00041.**

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

Company Name: H.A. Parts Products of Indiana Company, Inc.
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: 133-21695
Plt ID: 133-00041
Reviewer: Jenny Acker
Date: 2-Sep-05

State Potential Emissions (uncontrolled):																			
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency		
Flocking																			
Adhesive, MIBK, Catalyst	FL101, FL112	7.38	80.00%	0.00%	80.00%	0.00%	20.00%	1.0625 gal/hr		5.9	5.90	0.85	20.40	3.72	0.84	295.20	10.0%		
Co-Extrusion																			
A-1689-B/MEK Mix	CX111 and CX115	6.76	98.50%	0.00%	98.50%	0.00%	1.50%	1.0000	0.20	6.7	6.66	1.34	32.12	5.86	0.00	443.91	100.0%		
Total State Potential Emissions:												2.19	52.52	9.58	0.84				

Methodology:

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

**Appendix A: Emission Calculations
HAP Emissions
From Flocking and Co-Extrusion**

Company Name: H.A. Parts Products of Indiana Company, Inc.
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: 133-21695
Plt ID: 133-00041
Reviewer: Jenny Acker
Date: 2-Sep-05

State Potential Emissions (uncontrolled):														
Material (as applied)	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % MIBK	Weight % Toluene	Weight % Methyl Methacrylate	Weight % Formaldehyde	MEK Emissions ton/yr	MIBK Emissions ton/yr	Toluene Emissions ton/yr	Methyl Methacrylate Emissions ton/yr	Formaldehyde Emissions ton/yr
Flocking														
Adhesive, MIBK, Catalyst	FL101, FL112	7.38	1.0625 gal/hr		4.86%	65.43%	1.29%	0.00%	0.00%	0.23	3.04	0.06	0.00	0.00
Co-Extrusion														
A-1689-B/MEK Mix	CX111 and CX115	6.76	1.0000	0.20	81.25%	0.00%	10.00%	0.25%	0.03%	4.84	0.00	0.60	0.01	0.00

Total State Potential Emissions:

5.06	3.04	0.65	0.01	0.00
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Total HAPs:

8.78

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