CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

GR Plastics, Inc.
2508 Industrial Drive
Goshen, Indiana 46526

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-039-9299-00483	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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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 Management (OAM), and presented in the permit application.

A.1 General Information

The Permittee owns and operates a urethane products coating plant which involves surface coating of silicone rubber and urethane products.

Responsible Official:	Patrick Goveia
Source Address:	2508 Industrial Drive, Goshen, Indiana 46526
Mailing Address:	1525 S. 10th Street, Goshen, Indiana 46526
SIC Code:	3086
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) two (2) lacquer spray booths, exhausting to stacks identified as 001 and 002, each with:
  (i) maximum hourly capacities of 40 silicone rubber molds per hour,
  (ii) dry filters as control devices for overspray, and
  (iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of white vinyl lacquer per silicone rubber mold or 0.003 gallons of lacquer thinner per silicone rubber mold at a rate of 1 mold per hour; and

(b) one (1) water based paint spray booth, exhausting to a stack identified as 003, with:
  (i) a maximum hourly capacity of 40 urethane products per hour,
  (ii) dry filters as control devices for overspray, and
  (iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of satin white waterbase per urethane product.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This new stationary source will not be required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because the potential to emit (PTE) of:

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

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

(b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

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

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).

Operation Conditions

B.6 General Operation Conditions

(a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

(b) The Permittee shall 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 (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

(a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

(b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this urethane coating operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

(b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

(c) The OAM shall reserve the right to issue a new permit.

B.9 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent

reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.10 Availability of Permit [326 IAC 2-1-3(I)]

Pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential VOC emissions to 250 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos,

including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

C.8 Compliance Monitoring

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) asbestos removal or demolition start date;

(B) removal or demolition contractor; or

(3) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Record Keeping and Reporting Requirements

C.11 Annual Emission Reporting [326 IAC 2-6]

That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

C.12 Monitoring Data Availability

(a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down

or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.14 General Reporting Requirements

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) an emergency as defined in 326 IAC 2-7-1(12);

(3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation; or

(4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.15 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D FACILITY CONDITIONS

a) two (2) lacquer spray booths, exhausting to stacks identified as 001 and 002, each with:
(i) maximum hourly capacities of 40 silicone rubber molds per hour,
(ii) dry filters as control devices for overspray, and
(iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of white vinyl lacquer per silicone rubber mold or 0.003 gallons of lacquer thinner per silicone rubber mold at a rate of 1 mold per hour; and

b) one (1) water based paint spray booth, exhausting to a stack identified as 003, with:
(i) a maximum hourly capacity of 40 urethane products per hour,
(ii) dry filters as control devices for overspray, and
(iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of satin white waterbase per urethane product.

Emissions Limitation and Standards

D.1.1 BACT Minor Limitation

(a) The input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the two (2) white vinyl lacquer spray booths, 001 and 002, shall be limited to 24 tons per 365 day period for each booth, rolled on a daily basis. Since there are no VOC emission controls, the VOC input will equal the VOC output for determination purposes. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.

(b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

D.1.2 Particulate Matter (PM) Process Operation (326 IAC 6-3)

The PM from the three (3) surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be in operation at all times when the paint and lacquer booths are in operation.

Compliance Monitoring Requirements

D.1.5 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, daily observations shall be made of the overspray while the booth is in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Compliance response for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.

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

Record Keeping and Reporting Requirements

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount of VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each calendar day;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each calendar day and month; and

(6) The weight of VOC emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

COMPLIANCE DATA SECTION

Monthly Report

Source Name: GR Plastics, Inc.
Source Address: 2508 Industrial Drive, Goshen, Indiana 46526
Mailing Address: 2508 Industrial Drive, Goshen, Indiana 46526
Construction Permit No.: CP039-9299-00483
Facility: Two (2) White Vinyl Lacquer Surface Coating Booths
Parameter: Volatile Organic Compounds
Limit: 24 tons (48,000 pounds) per 365 day period for each booth, rolled on a daily basis

Month: _____ Year: _____

Day	Pounds of VOC per day	Pounds of VOC Previous 364 days	Tons of VOC for 365 day total	Day	Pounds of VOC per day	Pounds of VOC Previous 364 days	Tons of VOC for 365 day total
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

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

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ?_____, 100 LBS/HR VOC ?_____, 100 LBS/HR SULFUR DIOXIDE ?_____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ?_____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: GR Plastics, Inc. PHONE NO. (219) 537-6317

LOCATION: (CITY AND COUNTY) Goshen / Elkhart
PERMIT NO. 039-9299 AFS PLANT ID: 039-00483 AFS POINT ID: _____ INSP:_____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____
_____
_____

MALFUNCTION REPORTED BY:
_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____DATE:_____TIME:_____

FAX NUMBER - 317 233-5967 *SEE REVERSE
PAGE 1 OF 2

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

the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO2, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	GR Plastics, Inc.
Source Location:	2516 Industrial Drive, Goshen, IN 46526
County:	Elkhart
Construction Permit No.:	CP-039-9299-00483
SIC Code:	3086
Permit Reviewer:	Jon C. Akin

The Office of Air Management (OAM) has reviewed an application from GR Plastics, Inc. relating to the construction and operation of a urethane products surface coating operation, consisting of the following equipment:

(a) two (2) lacquer spray booths, exhausting to stacks identified as 001 and 002, each with:
  (i) maximum hourly capacities of 40 silicone rubber molds per hour,
  (ii) dry filters as control devices for overspray, and
  (iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of white vinyl lacquer per silicone rubber mold or 0.003 gallons of lacquer thinner per silicone rubber mold; and

(b) one (1) water based paint spray booth, exhausting to a stack identified as 003, with:
  (i) a maximum hourly capacity of 40 urethane products per hour,
  (ii) dry filters as control devices for overspray, and
  (iii) one (1) 15 pound per square inch (psi) spray coating gun, with an orifice size of 0.06 inches and using 0.033 gallons of satin white waterbase per urethane product.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
001	Lacquer Spray Booth	28	2	9720	70
002	Lacquer Spray Booth	28	2	9720	70
003	Water Based Paint Spray Booth	28	2	6788	70

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on December 12, 1997.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (4 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	1.77	54.22
Particulate Matter (PM10)	-	-
Sulfur Dioxide (SO_2)	-	-
Volatile Organic Compounds (VOC)	80.65	80.65
Carbon Monoxide (CO)	-	-
Nitrogen Oxides (NO_x)	-	-
Single Hazardous Air Pollutant (HAP)	2.95	2.95
Combination of HAPs	3.12	3.12

(a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See calculations in the State Rule Applicability section.

(b) The allowable emissions based on the rules cited are less than the potential emissions, therefore, the allowable emissions are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Actual Emissions

No previous emission data has been received from the source, because this is a new source.

Limited Potential to Emit

The source has accepted a state synthetic minor limit on potential to emit volatile organic

compounds (VOC) of 24 tons per per 365 day period, rolled on a daily basis, from each of the two (2) lacquer spray booths to avoid being subject to Best Available Control Technology (BACT) Analysis (326 IAC 8-1-6). Since there are no controls for VOC emissions, the VOC emissions are equivalent to the VOC inputs in each booth.

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

	Limited Potential to Emit* (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
White Vinyl Lacquer Spray Booth 001	0.16	-	-	23.90	-	-	0.92
White Vinyl Lacquer Spray Booth 002	0.16	-	-	23.90	-	-	0.92
Lacquer Thinner Spray Booth 001	-	-	-	0.09	-	-	0.10
Lacquer Thinner Spray Booth 002	-	-	-	0.09	-	-	0.10
Water Based Paint Spray Booth 003	0.75	-	-	4.35	-	-	-
Total Emissions	1.07	-	-	52.33	-	-	2.04

*-limited potential to emit with 24 tons VOC per year limit on each lacquer spray booth and controlled particulate emissions on all applicable facilities

County Attainment Status

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the

ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for oxides of nitrogen (NO_X), sulfur dioxide (SO_2), particulate matter (PM/PM-10), and carbon monoxide (CO). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This is the first air approval issued to this source.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 63, 40 CFR 61, and 326 IAC 14) applicable to this source.

State Rule Applicability

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

The source is not subject to these rules because potential VOC emissions are less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

The source is subject to this rule because it is located in Elkhart County and has the potential to emit volatile organic compounds (VOC) at a level greater than or equal to 10 tons per year.

Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission

statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

326 IAC 5-1-2 (Visible Emissions Limitations)

The source is subject to this rule except as provided in 326 IAC 5-1-3 (Temporary Exemptions).

The visible emissions shall meet the following:

(a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.

(b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3 (PM process operation)

The source is subject to this rule for the PM overspray from the surface coating operations because no other 326 IAC 6 rules apply:

The surface coating booths shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

The surface coating booths comply with this rule by using dry filters as overspray control devices.

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

The two (2) white vinyl lacquer surface coating booths, identified as 001 and 002, are subject to this rule since they are new facilities which are not subject to any other 326 IAC 8 rules and Each has potential volatile organic compound (VOC) emissions of 25 tons per year or more. The applicant has chosen to accept a VOC limitation of 24 tons per year for each of the two (2) lacquer booths. The waterbased paint surface coating booth, identified as 003, is not subject to

this rule because it does not have potential VOC emissions of 25 tons per year or more. Therefore, the applicant is not subject to 326 IAC 8-1-6 or BACT analysis (Best Available Control Technology).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This new source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

(b) See attached spreadsheets for detailed air toxic calculations.

(c) This new source is not subject to 326 IAC 2-1-3.4 (New Source Toxics Control) because potential emissions of a single HAP are less than 10 tons per year and potential emissions of total HAPs are less than 25 tons per year.

Conclusion

The construction of the urethane products surface coating operations will be subject to the conditions of the attached proposed **Construction Permit No. CP-039-9299-00483.**

HAP Emission Calculations

Company Name: GR Plastics, Inc.
Plant Location: 2516 Industrial Drive, Goshen, IN 46526
County: Elkhart
Permit Reviewer: Jon C. Akin
Date: 12/31/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Methyl Ethyl Ketone	Weight % Toluene	Weight % Methyl Isobutyl Ketone		Methyl Ethyl Ketone Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Iso-Butyl Ketone Emissions (ton/yr)	Total HAPs Emissions (ton/yr)
White Vinyl Lacquer 001	8.5	0.03300	40.000	3.00%	0.00%	0.00%		1.47	0.00	0.00	1.47
White Vinyl Lacquer 002	8.5	0.03300	40.000	3.00%	0.00%	0.00%		1.47	0.00	0.00	1.47
Lacquer Thinner 001	7.1	0.00300	1.000	10.00%	70.00%	20.00%		0.01	0.07	0.02	0.10
Lacquer Thinner 002	7.1	0.00300	1.000	10.00%	70.00%	20.00%		0.01	0.07	0.02	0.10
Satin White Waterbase	11.0	0.03300	40.000	0.00%	0.00%	0.00%		0.00	0.00	0.00	0.00
Total State Potential Emissions								**2.95**	**0.13**	**0.04**	**3.14**

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

Methyl Ethyl Ketone Limited Emission Calculations

Company Name: **GR Plastics, Inc.**
Plant Location: **2516 Industrial Drive, Goshen, IN 46526**
County: **Elkhart**
Permit Reviewer: **Jon C. Akin**
Date: **12/31/97**

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Methyl Ethyl Ketone	Limited Emission Rate Methyl Ethyl Ketone (tons/yr)
White Vinyl Lacquer	8.5	0.03300	40.000	3.00%	0.92
White Vinyl Lacquer	8.5	0.03300	40.000	3.00%	0.92

Total State Potential Emissions **1.84**

METHODOLOGY

White Vinyl Lacquer MEK emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % MEK * 5502 hrs/yr * 1 ton/2000 lbs

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

Company Name: GR Plastics, Inc.
Address City IN Zip: 2516 Industrial Drive, Goshen, IN 46526
Reviewer: Jon C. Akin
Date: 12/31/97

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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	VOC pounds per hour	Limited VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
White Vinyl Lacquer 001	8.5	77.80%	0.0%	77.8%	0.0%	22.20%	0.03300	40.000	6.58	6.58	8.69	23.90	6.82	29.65	0%
White Vinyl Lacquer 002	8.5	77.80%	0.0%	77.8%	0.0%	22.20%	0.03300	40.000	6.58	6.58	8.69	23.90	6.82	29.65	0%
State Potential Emissions			**Add worst case coating to all solvents**								**17.38**	**47.80**	**13.64**		

Particulate PTE (Potential to Emit) After Controls (97.7% efficient): **0.31** ton/yr

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)
VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Limited VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (5502 hr/yr) * (1 ton/2000 lbs)
Particulate Limited Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(5502 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

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

Company Name: **GR Plastics, Inc.**
Address City IN Zip: **2516 Industrial Drive, Goshen, IN 46526**
Reviewer: **Jon C. Akin**
Date: **12/31/97**

Material	Density (Lb/Gal)	Weight % Volatile (H20& 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
White Vinyl Lacquer 001	8.5	77.80%	0.0%	77.8%	0.0%	22.20%	0.03300	40.000	6.58	6.58	8.69	208.51	38.05	10.86	29.65	0%
White Vinyl Lacquer 002	8.5	77.80%	0.0%	77.8%	0.0%	22.20%	0.03300	40.000	6.58	6.58	8.69	208.51	38.05	10.86	29.65	0%
Lacquer Thinner 001	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00300	1.000	7.13	7.13	0.02	0.51	0.09	0.00	0.00	0%
Lacquer Thinner 002	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00300	1.000	7.13	7.13	0.02	0.51	0.09	0.00	0.00	0%
Satin White Waterbase 003	11.0	48.85%	42.0%	6.9%	55.5%	34.70%	0.03300	40.000	1.69	0.75	0.99	23.85	4.35	32.50	2.17	0%
State Potential Emissions			**Add worst case coating to all solvents**								**18.41**	**441.90**	**80.65**	**54.22**		

Particulate PTE (Potential to Emit) After Controls (97.7% efficient): **1.25** ton/yr

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

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	GR Plastics, Inc.
Source Location:	2508 Industrial Drive, Goshen, IN 46526
County:	Elkhart
Construction Permit No.:	CP-039-9299-00483
SIC Code:	3086
Permit Reviewer:	Jon C. Akin

On January 19,1998, the Office of Air Management (OAM) had a notice published in the Goshen News, Goshen, Indiana, stating that GR Plastics, Inc. had applied for a construction permit to construct and operate a urethane products surface coating operation with dry filters for overspray control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 12, GR Plastics, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

Comment 1: The source address has been renumbered to 2508 Industrial Drive, Goshen, IN 46526. The source location remains the same.

Response 1: The source address in the Construction Permit CP-039-9299-00483 has been changed to 2508 Industrial Drive, Goshen, IN 46526. Since the change is in address only, there is no additional change on the status of the source.

Upon further review, OAM has made the following changes:

Comment 2: The surface coating booths covered in this permit are not subject to 326 IAC 1-7 (Stack Height Provisions) because they have actual particulate matter emissions less than 25 tons per year.

Response 2: Proposed permit condition C.7, Stack Height [326 IAC 1-7], shall be removed from the permit. Preceeding or subsequent conditions have been renumbered due to this deletion.