

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Guardian Automotive Products, Inc.
1900 South Center Street
Auburn, Indiana 46706**

(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.

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.: T033-12745-00022	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration 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 Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary automotive window panel manufacturing.

Responsible Official:	David Blazer
Source Address:	1900 South Center Street, Auburn, IN 46706
Mailing Address:	1900 South Center Street, Auburn, IN 46706
General Source Phone Number:	(219) 925-5656
SIC Code:	3231
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules;

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

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) constructed in 1988, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) constructed in 1992, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4) constructed in 1998, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) constructed in 2001, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collectors as particulate control, exhausting to the interior of the building.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

- (b) One (1) glass laminating process using spray application method, identified as Laminating - Autoclave Exhaust, with an overall maximum laminating capacity of 181 units per hour and maximum coating throughput of 0.58 lb/hr, and exhausting through stack B. [326 IAC 6-3-2]
- (c) One (1) molding operation, identified as Molding - Mezzanine A and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, applying channel primer and mold release using spray application method, identified as Booths 3, 4, 7, 8 and 9, capable of processing maximum of 162 units per hour, with maximum coating throughput of 0.343 lb/hr, and all exhausting through one (1) stack identified as stack H1.
 - (ii) Four (4) application booths, applying channel primer using spray application method, identified as Booths 1, 2, 5 and 6, capable of processing maximum of 136 units per hour, with maximum coating throughput of 0.023 lb/hr, and all exhausting through one (1) stack identified as stack H2.
- (d) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.
- (e) One (1) molding operation, identified as Molding - Mezzanine C and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 15, 16, 17, 18, and 19, each capable of processing maximum of 10 units per hour, each with a maximum coating throughput of 0.33 lb/hr and each exhausting through one (1) stack, identified as stack J1, J2, J3, J4 and J5, respectively.

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

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

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (a) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated

before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) **Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]**
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-7-3]**
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]**
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

-
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425

(ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (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. 326 IAC 9-1-2 is not federally enforceable.
- 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 [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ,, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ,, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as

defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports 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 for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Quality
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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 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.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) constructed in 1988, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) constructed in 1992, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4) constructed in 1998, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) constructed in 2001 , with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collectors as particulate control, exhausting to the interior of the building.

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

- (a) Any change or modification to the Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), and GMT 800 POP Out PVC Line (Unit 4) that may increase the PTE of VOC from any of the units to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.
- (b) Any change or modification to the three (3) diatomaceous earth coating lines (Lines 1, 2 and 3) that may increase the total PTE of VOC combined from the three (3) diatomaceous earth coating lines to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.2 HAPs [326 IAC 2-4.1-1]

Any change or modification to the GMT 800 POP Out PVC Line that may increase the PTE of hazardous air pollutant (HAPs) to greater than 10 and 25 tons per twelve (12) consecutive month period, for single HAP and combined HAPs, respectively, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 2-4.1-1

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3, and one (1) molding line, identified as GMT 800 POP Out PVC Line shall be limited by the following:

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

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

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

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1.
- (1) The amount and VOC 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 weight of VOCs emitted for each unit for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]
- (b) One (1) glass laminating process using spray application method, identified as Laminating - Autoclave Exhaust, with an overall maximum laminating capacity of 181 units per hour and maximum coating throughput of 0.58 lb/hr, and exhausting through stack B. [326 IAC 6-3-2]
- (c) One (1) molding operation, identified as Molding - Mezzanine A and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, applying channel primer and mold release using spray application method, identified as Booths 3, 4, 7, 8 and 9, capable of processing maximum of 162 units per hour, with maximum coating throughput of 0.343 lb/hr, and all exhausting through one (1) stack identified as stack H1.
 - (ii) Four (4) application booths, applying channel primer using spray application method, identified as Booths 1, 2, 5 and 6, capable of processing maximum of 136 units per hour, with maximum coating throughput of 0.023 lb/hr, and all exhausting through one (1) stack identified as stack H2.
- (d) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.
- (e) One (1) molding operation, identified as Molding - Mezzanine C and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 15, 16, 17, 18, and 19, each capable of processing maximum of 10 units per hour, each with a maximum coating throughput of 0.33 lb/hr and each exhausting through one (1) stack, identified as stack J1, J2, J3, J4 and J5, respectively.

(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 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for cold cleaning type parts degreaser:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the insignificant activities identified as Laminating - Autoclave Exhaust, Molding - Mezzanine A (Booths 3, 4, 7, 8 and 9), Molding - Mezzanine B (Booths 10, 11, 12, 13 and 14), and Molding - Mezzanine C (Booths 15, 16, 17, 18 and 19) shall be limited by the following:

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

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

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

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Guardian Automotive Products, Inc.
Source Address: 1900 South Center Street, Auburn, IN 46706
Mailing Address: 1900 South Center Street, Auburn, IN 46706
Part 70 Permit No.: 033-12745-00022

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Guardian Automotive Products, Inc.
Source Address: 1900 South Center Street, Auburn, IN 46706
Mailing Address: 1900 South Center Street, Auburn, IN 46706
Part 70 Permit No.: 033-12745-00022

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- c** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - c** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Guardian Automotive Products, Inc.
Source Address: 1900 South Center Street, Auburn, IN 46706
Mailing Address: 1900 South Center Street, Auburn, IN 46706
Part 70 Permit No.: 033-12745-00022

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Part 70 Permit

Source Name: Guardian Automotive Products, Inc.
Source Location: 1900 South Center Street, Auburn, IN 46706
County: Dekalb
SIC Code: 3231
Operation Permit No.: T033-12745-00022
Permit Reviewer: Adeel Yousuf/EVP

On January 2, 2002, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star in Auburn, Indiana, stating that Guardian Automotive Products, Inc. had applied for a Part 70 permit for the operation of stationary automotive glass fabrication facility. The notice also stated that OAQ proposed to issue a Part 70 Permit for this installation and provided information on how the public could review the proposed Part 70 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 Part 70 Significant Source Modification should be issued as proposed.

On February 4, 2002, Don McCrady, Environmental Engineer at Guardian Automotive Products, Inc. submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Please remove item (a)(2) Silkscreen Cleaning Booth from the list of Insignificant Activities in the TSD. This operation is out of service. Silkscreen cleaning operations are now conducted at the various silkscreen rooms identified as Insignificant Activities source Laminating - Cutting Paint Room, Tempering - F467 Black Frit Paint, Tempering - F497 Black Frit Paint, Tempering - Silver Paint Room, exhausting through stacks A, C and to the interior of the building. An additional comment is that the silkscreen cleaning operation uses a spray application method and not a rollcoat application method.

Response 1

Silkscreen cleaning operation was listed only in the Technical Support Document and not in the Part 70 permit as it is an insignificant activity which is not specifically regulated. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, the Technical Support Document was not revised for these changes

Condition A.2 and Section D.1 are revised to add the construction dates of units (a) through (d).

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

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) **constructed in 1988**, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) **constructed in 1992**, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4) **constructed in 1998**, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) **constructed in 2001**, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collectors as particulate control, exhausting to the interior of the building.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) **constructed in 1988**, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) **constructed in 1992**, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4) **constructed in 1998**, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) **constructed in 2001**, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collectors as particulate control, exhausting to the interior of the building.

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

The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19th, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at <http://www.state.in.us/idem/air/rules/apcb/packets/index.html>. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the internet at <http://www.IN.gov/legislative/register/index-25.html>.

1. Condition B.2 Permit Term is revised to add the new rule cite.

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

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

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

.....

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the~~

~~situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. A new Condition B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,**
- (2) revised, or**
- (3) deleted**

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Paragraph (b) has been removed from Condition B.13 Permit Shield. Since Condition B.14 Prior Permit Conditions Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

~~B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. C.15 Compliance Response Plan - Failure to Take Response Steps (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications. Also, the title of this condition has been changed.

C.15 Compliance Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Guardian Automotive Products, Inc.
Source Location: 1900 South Center Street, Auburn, IN 46706
County: Dekalb
SIC Code: 3231
Operation Permit No.: T033-12745-00022
Permit Reviewer: Adeel Yousuf/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Guardian Automotive Products, Inc. relating to the operation of stationary automotive glass fabrication facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2), with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3), with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4), with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3), with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collectors as particulate control, exhausting to the interior of the building.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities at this source during this renewal review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour:
 - (1) One (1) silkscreen process, identified as Laminating - Cutting Paint Room, with an overall maximum processing capacity of 131 units per hour and maximum coating throughput of 5.73 lb/hr, and exhausting through stack A.
 - (2) One (1) silkscreen cleaning booth using rollcoat application method, identified as Laminating and Tempering Silkscreen cleaning operation, with an overall maximum capacity of cleaning 768 parts per hour and maximum cleaner usage of 4.54 lb/hr, and exhausting through stack F.
 - (3) One (1) glass laminating process using spray application method, identified as Laminating - Autoclave Exhaust, with an overall maximum laminating capacity of 181 units per hour and maximum coating throughput of 0.58 lb/hr, and exhausting through stack B.
 - (4) One (1) silkscreen process, identified as Tempering - F467 Black Frit Paint Room, with an overall maximum processing capacity of 434 units per hour and maximum paint throughput of 7.15 lb/hr, and exhausting through stack C.
 - (5) One (1) silkscreen process, identified as Tempering - F497 Black Frit Paint Room, with an overall maximum processing capacity of 125 units per hour and maximum paint throughput of 2.014 lb/hr, and exhausting to the interior of the building.
 - (6) One (1) silkscreen process, identified as Tempering - Silver Paint Room, with an overall maximum processing capacity of 125 units per hour and maximum paint throughput of 2.17 lb/hr, and exhausting through stack C.
 - (7) One (1) molding operation, identified as Molding - Mezzanine A and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, applying channel primer and mold release using spray application method, identified as Booths 3, 4, 7, 8 and 9, capable of processing maximum of 162 units per hour, with maximum coating throughput of 0.343 lb/hr, and all exhausting through one (1) stack identified as stack H1.
 - (ii) Four (4) application booths, applying channel primer using spray application method, identified as Booths 1, 2, 5 and 6, capable of processing maximum of 136 units per hour, with maximum coating throughput of 0.023 lb/hr, and all exhausting through one (1) stack identified as stack H2.
 - (8) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.

- (9) One (1) molding operation, identified as Molding - Mezzanine C and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 15, 16, 17, 18, and 19, each capable of processing maximum of 10 units per hour, each with a maximum coating throughput of 0.33 lb/hr and each exhausting through one (1) stack, identified as stack J1, J2, J3, J4 and J5, respectively.
- (10) One (1) molding operation, priming tempered glass parts using rollcoat application method with robotic applicators, identified as Molding - GMT 800 LG Auto Prime Line, with a an overall maximum processing capacity of 42 units per hour and with maximum coating throughput of , and exhausting through stack G.
- (11) Usage of following materials at the facility:
 - (i) Windex with maximum usage of 5870 lbs per year.
 - (ii) Mold cleaner # 201B with maximum usage of 1503 pounds per year.
 - (iii) Denatured Alcohol with maximum usage of 891 pound per year.
 - (iv) Lacquer thinner with maximum usage of 74 pounds per year.
 - (v) Sulfur-di-Oxide with maximum usage of 225 pounds per year.
- (b) Space heaters, process heaters, or boilers using the following fuels:
Natural gas-fired combustion sources with heat input equal to ro less then ten million (10,000,000) Btu per hour.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Natural draft cooling towers not regulated under a NESHAP.
- (g) Mold release agents using low volatile products (Vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

Existing Approvals

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

- (a) Registered Construction and Operation Status, issued on January 13, 1986;
- (b) Registration CP 033-4302-00022, issued on January 30, 1995;
- (c) Registration CP 033-6073-00022, issued on July 24, 1996; and
- (d) Part 70 Minor Source Modification 033-12959-00022, issued on January 24, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) MSM033-12959-00022, issued on January 24, 2001.

Condition 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, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation and exhausting to the atmosphere. 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.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason not incorporated:

Three (3) diatomaceous earth lines, identified as Lines 1, 2 and 3 permitted under MSM033-12959-00022 exhaust inside the building. The compliance monitoring condition is removed from this Part 70 permit because compliance monitoring is not applicable to the units exhausting inside the building.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 incomplete Part 70 permit application for the purposes of this review was received on September 25, 2000. Additional information received on October 18, 2001 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to the source on October 3, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (eighteen (18) pages).

Potential To Emit

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	30.98
PM-10	31.47
SO ₂	0.05
VOC	118.01
CO	7.33
NO _x	8.83

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	40.82
Glycol Ether	0.432
Methanol	4.46
Toluene	10.86
2-Butoxyethanol	0.15
Xylene	0.425
MDI	0.37
Hexane	0.157
TOTAL	57.69

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	93.05
CO	0.00
NO _x	0.00
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Unit 2: Manual Prime Line	-	-	-	19.93	-	-	19.37 (total) 9.88 (single)
Unit 3: Auto Prime Line	-	-	-	21.35	-	-	21.32 (total) 20.45 (single)
Unit 4: GMT 800 POP Out PVC Line	2.52	2.52	-	14.90	-	-	13.85 (total) 9.82 (single)
* Three (3) Diatomaceous Earth Coating Lines: Lines 1, 2 and 3	0.24	0.24	-	24.35	-	-	-
* Tempering Silkscreen Cleaning	-	-	-	12.37	-	-	-
* Cutting Paint Room	-	-	-	4.23	-	-	0.43 (total) 0.298 (single)
* Autoclave Exhaust	0.10	0.10	-	2.52	-	-	-
* Black Frit and Silver Paint Rooms	-	-	-	1.50	-	-	-
* Mezzanine A (Booths 1-9)	0.05	0.05-	-	1.59	-	-	0.20 (total) 0.098 (single)
* Mezzanine B (Booths 10-14)	2.25	2.25	-	9.20	-	-	-
* Mezzanine C (Booths 15-19)	1.46	1.46	-	2.17	-	-	-
* GMT 800 Auto Prime Line	-	-	-	2.12			2.10 (total) 0.673 (single)
* Natural combustion units	0.17	0.66	0.05	0.48	7.33	8.72	0.13 (total) 0.12 (single)
* Insignificant Activities	-	-	-	1.33	-	.11	0.25 (total) 0.15 (single)
Total Emissions	6.79	7.28	0.05	118.01	7.33	8.83	57.65 (total) 40.15 (single)

* These activities qualify as insignificant activities with VOC emission less than 3 pounds per hour (see

Insignificant Activities).

County Attainment Status

The source is located in Dekalb County.

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

- (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. Dekalb 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) Dekalb County has been classified as attainment or unclassifiable for all criteria pollutants. 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The parts degreasing operation that includes Safety-Kleen wash tank with capacity less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source does not use the regulated halogenated solvents in the degreasing operation; therefore, Subpart T does not apply.

- (c) 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 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD) as it has the potential to emit any criteria pollutant below 250 tons per 12-month period and this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with the Maximum Achievable Control Technology (MACT). This rule does not apply to facilities that have been constructed prior to the rule applicability date of July 27, 1997. Therefore, this rule does not apply to the Manual Prime Line (Unit 2) and Auto Prime Line (Unit 3), each constructed in 1988 and 1992, respectively. The GMT 800 POP Out PVC Line constructed in 1998 has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, and three (3) diatomaceous earth lines, identified as Lines 1, 2 and 3 constructed in 2001 do not have HAP emissions. Therefore, these units are not subject to the requirements of this rule.

326 IAC 6-3 (Process Operations)

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the three (3) Diatomaceous Earth Coating Lines (Lines 1, 2 and 3), and one (1) molding line, identified as GMT 800 POP Out PVC Line shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3 are in operation, in order to comply with this limit.

Other significant coating facilities identified as Manual Prime Line (unit 2) and Auto Prime Line (unit 3) at this source utilize either brush or rollcoat method for application and do not emit PM emissions. Therefore, all other coating operations are not subject to the requirements of rule 326 IAC 6-3 (Process Operations).

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the insignificant activities identified as Laminating - Autoclave Exhaust, Molding - Mezzanine A (Booths 3, 4, 7, 8 and 9), Molding - Mezzanine B (Booths 10, 11, 12, 13 and 14), and Molding - Mezzanine C (Booths 15, 16, 17, 18 and 19) shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Other insignificant coating facilities identified as Laminating and Tempering Silkscreen cleaning operation, Laminating - Cutting Paint Room, Tempering (F467/497 Black Frit and Silver paint room) at the source utilize either silkscreen process, brush or rollcoat method for application and do not emit PM emissions. Therefore, all other coating operations are not subject to the requirements of rule 326 IAC 6-3 (Process Operations).

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. Each of the coating operations including Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT 800 POP Out PVC Line (Unit 4) and insignificant activities (Tempering Silkscreen Cleaning, Cutting Paint Room, Autoclave Exhaust, Black Frit and Silver Paint Rooms, Mezzanine A, B and C, GMT 800 Auto Prime Line, and Miscellaneous clean-up operations) has potential VOC emissions less than 25 tons per year; therefore, this rule does not apply.

Three (3) surface coating lines identified as diatomaceous earth coating lines (constructed in 2001), have potential volatile organic compound (VOC) emissions less than 25 TPY combined for all three lines, therefore, this rule does not apply to the facility.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

326 IAC 8-2-2 does not apply as the Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT 800 POP Out PVC Line (Unit 4) and three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3 do not apply prime and topcoat coatings on automobile and light duty truck bodies, hoods, fenders, cargo boxes, doors and grill opening panels.

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

The surface coating operations of the Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT

800 POP Out PVC Line (Unit 4) and three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3 are not subject to the provisions of 326 IAC 8-2-9. This rule applies to facilities which engage in miscellaneous metal surface coating and have potential emissions of 25 tons/yr or greater. These surface coating lines coat glass, and are therefore not subject to this rule.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in DeKalb County and maintains Safety-Kleen type cold cleaning parts washer with capacities of less than 145 gallons (i.e., insignificant activities), is subject to the applicable rule requirements since the facilities are new after January 1, 1980. As such, and pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for each of the four (4) cold cleaning facilities:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoir that either existed as of July 1, 1990 and was located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located in anywhere in the state. This source, located in DeKalb County which is a non-listed county, is not subject to the applicable rule requirements since the degreaser was existing as of July 1, 1990 (i.e., installed in 1989), and the degreaser has remote solvent reservoir.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

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

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in DeKalb County. Therefore, this rule is not applicable to this source.

Testing Requirements

Testing is not required for the Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT 800 POP Out PVC Line (Unit 4) and three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3 because compliance with the VOC emission limits can be demonstrated through record keeping and reporting.

Compliance Requirements

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

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

There are no compliance monitoring requirements applicable to this source.

Minor Source Modification 033-12959-00022, issued on January 24, 2001, contains applicable compliance monitoring for the three (3) Diatomaceous Earth Coating Lines, identified as Lines 1, 2 and 3. These Diatomaceous Earth Coating Lines with potential PM emissions of 5.57 lb/hr, exhaust inside the building and do not have any stack exhaust. Thus compliance monitoring is not applicable to these units.

Conclusion

The operation of this automotive window panel shall be subject to the conditions of the attached proposed **Part 70 Permit No. T033-12745-00022**.

Appendix A: Emission Calculations

Company Name: Guardian Automotive Products, Inc.
 Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
 Operating Permit No.: 033-12745-00022
 Pit ID: Adee! Youss!#EVP
 Reviewer: September 24, 2001
 Date: 03/27/2002

Uncontrolled Potential Emissions (tons/year)

Pollutant	Natural Gas	Molding	Molding	Molding	Coating	Laminating and	Laminating	Laminating	Tempering	Molding	Molding	Molding	Molding	Other	Total
	Combustion	Manual Prime Line	Auto Prime Line	GMT 800 POP Out PVC Line	Diatomaceous Earth Coating Line	Tempering Silkscreen cleaning	Cutting Paint Room	Autoclave Exhaust	Black Frit and Silver Paint Rooms	Mezzanine A (Booths 1-9)	Mezzanine B (Booths 10-14)	Mezzanine C (Booths 15-19)	GMT 800 Auto Prime Line	Insignificant Activities	
		Unit 2	Unit 3	Unit 4	Lines 1, 2 and 3	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant		
PM	0.17	0.00	0.00	2.52	24.43	0.00	0.00	0.10	0.00	0.05	2.25	1.46	0.00	0.00	30.98
PM10	0.66	0.00	0.00	2.52	24.43	0.00	0.00	0.10	0.00	0.05	2.25	1.46	0.00	0.00	31.47
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.11	8.83
VOC	0.48	19.93	21.35	14.90	24.35	12.37	4.22	2.51	1.51	1.59	9.20	2.17	2.11	1.33	118.01
CO	7.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.33
total HAPs	0.16	19.37	21.32	13.85	0.00	0.00	0.43	0.00	0.00	0.20	0.00	0.00	2.10	0.25	57.69
worst case single HAP	0.157 (Hexane)	9.88 (MEK)	20.45 (MEK)	9.82 (MEK)	0	0	0.298 (Glycol Ether)	0	0	0.049 (Methanol)	0	0	0.673 (Toluene)	0.149 (2-Butoxyethanol)	40.15 (MEK)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Pollutant	Natural Gas	Molding	Molding	Molding	Coating	Laminating and	Laminating	Laminating	Tempering	Molding	Molding	Molding	Molding	Other	Total
	Combustion	Manual Prime Line	Auto Prime Line	GMT 800 POP Out PVC Line	Diatomaceous Earth Coating Line	Tempering Silkscreen cleaning	Cutting Paint Room	Autoclave Exhaust	Black Frit and Silver Paint Rooms	Mezzanine A (Booths 1-9)	Mezzanine B (Booths 10-14)	Mezzanine C (Booths 15-19)	GMT 800 Auto Prime Line	Miscellaneous clean-up operations	
		Unit 2	Unit 3	Unit 4	Lines 1, 2 and 3	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	Insignificant	
PM	0.17	0.00	0.00	2.52	0.24	0.00	0.00	0.10	0.00	0.05	2.25	1.46	0.00	0.00	6.79
PM10	0.66	0.00	0.00	2.52	0.24	0.00	0.00	0.10	0.00	0.05	2.25	1.46	0.00	0.00	7.28
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.11	8.83
VOC	0.48	19.93	21.35	14.90	24.35	12.37	4.22	2.51	1.51	1.59	9.20	2.17	2.11	1.33	118.01
CO	7.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.33
total HAPs	0.16	19.37	21.32	13.85	0.00	0.00	0.43	0.00	0.00	0.20	0.00	0.00	2.10	0.25	57.69
worst case single HAP	0.157 (Hexane)	9.88 (MEK)	20.45 (MEK)	9.82 (MEK)	0	0	0.298 (Glycol Ether)	0	0	0.098 (Methanol)	0	0	0.673 (Toluene)	0.149 (2-Butoxyethanol)	40.15 (MEK)

Total emissions based on rated capacity at 8,760 hours/year, after control.

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 15, 2001**

Unit 3: Molding Auto Prime Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	7.0	99.20%	0.0%	99.2%	0.0%	0.08%	0.00045	47.000	6.94	6.94	0.15	3.52	0.64	0.00	8680.00	100%
Essex 43520A Black Primer	8.4	57.80%	0.0%	57.8%	0.0%	42.20%	0.00117	47.000	4.83	4.83	0.27	6.38	1.16	0.00	11.44	100%
MEK line flush tip cleaning spray	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.01390	47.000	6.83	6.83	4.46	107.09	19.54	0.00	FRR	100%

State Potential Emissions

Add worst case coating to all solvents

4.87 116.99 21.35 0.00

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)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	99.00%	4.87	116.99	21.35	0.00

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 Permit: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: September 19, 2001**

Unit 2: Molding Manual Prime Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	7.0	99.20%	0.0%	99.2%	0.0%	0.08%	0.00045	513.000	6.94	6.94	1.60	38.47	7.02	0.00	8680.00	100%
Essex 43520A Black Primer	8.4	57.80%	0.0%	57.8%	0.0%	42.20%	0.00119	513.000	4.83	4.83	2.95	70.71	12.90	0.00	11.44	100%

State Potential Emissions

Add worst case coating to all solvents

4.55 109.18 19.93 0.00

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)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	4.55	109.18	19.93	0.00

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Pit ID: Adeel Yousuf/EVP
Permit Reviewer: October 5, 2001**

Unit 2: Molding Manual Prime Line

Uncontrolled HAP emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % MEK	Weight % Xylene	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)
Essex 43518 Clear Primer	7	0.000450	513.00	52.50%	47.50%	0.00%	0.00%	3.72	3.36	0.00	0.00
Essex 43520A Black Primer	8.35	0.001170	513.00	10.00%	0.00%	45.00%	1.00%	2.20	0.00	9.88	0.22

Total State Potential Emissions

5.91 3.36 9.88 0.22

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001

Unit ID 4: Molding GMT 800 Pop Out PVC Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	7.0	99.20%	0.0%	99.2%	0.0%	0.08%	1.71E-06	163.000	6.94	6.94	0.00	0.05	0.01	0.00	8680.00	50%
Essex 43520A Black Primer	8.4	57.80%	0.0%	57.8%	0.0%	42.20%	1.0E+05	163.000	4.83	4.83	0.01	0.19	0.03	0.01	11.44	50%
Essex Betamate 73005 button adhesive	10.8	0.30%	0.0%	0.3%	0.0%	0.00%	0.00018	163.000	0.03	0.03	0.00	0.02	0.00	0.69	FRR	50%
Essex Betamate 73100 button adhesive	11.1	0.40%	0.0%	0.4%	0.0%	0.00%	0.00020	163.000	0.04	0.04	0.00	0.03	0.01	0.79	FRR	50%
Sovereign A1167B PVC adhesive	7.3	88.20%	0.0%	88.2%	0.0%	0.00%	0.00029	163.000	6.41	6.41	0.30	7.27	1.33	0.09	FRR	50%
Sovereign A1669B PVC Adhesive	7.4	80.40%	0.0%	80.4%	0.0%	0.00%	0.00180	163.000	5.97	5.97	1.75	42.01	7.67	0.93	FRR	50%
MEK	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00120	163.000	6.83	6.83	1.34	32.06	5.85	0.00	FRR	50%

State Potential Emissions

Add worst case coating to all solvents

3.40 81.64 14.90 2.52

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)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	3.40	81.64	14.90	2.52

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001

Unit ID 4: Molding GMT 800 Pop Out PVC Line

Uncontrolled HAP emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Methanol	Weight % Toluene	Weight % MEK	Weight % MDI	Weight % Propylene Oxide	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MDI Emissions (ton/yr)	Propylene Oxide Emissions (ton/yr)
Essex 43518 Clear Primer	7	1.71E-06	163.00	0.00%	47.50%	52.50%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Essex 43520A Black Primer	8.35	1.0E-05	163.00	1.00%	0.00%	10.00%	45.00%	0.00%	0.00%	0.00	0.00	0.01	0.03	0.00	0.00
Essex Betamate 73005 button adhesive	10.79	0.000180	163.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Essex Betamate 73100 button adhesive	11.13	0.000200	163.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Sovereign A1167B PVC adhesive	7.27	0.000290	163.00	0.00%	0.00%	40.00%	40.00%	0.00%	0.00%	0.00	0.00	0.60	0.60	0.00	0.00
Sovereign A1669B PVC Adhesive	7.42	0.001800	163.00	1.78%	0.12%	30.00%	35.00%	0.00%	1.00%	0.17	0.01	2.86	3.34	0.00	0.00
MEK	6.83	0.001200	163.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	5.85	0.00	0.00
MDI	Not entirely emitted, but consumed as reactant in adhesive													0.37	

Total State Potential Emissions

0.17 0.02 3.47 9.82 0.37 0.00

METHODOLOGY

Total HAPs 13.85

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001**

Three (3) Diatomaceous earth lines

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Isopropyl Alcohol/Powder Application Line 1	9.3	78.65%	68.0%	10.6%	74.7%	10.31%	0.02590	72.500	3.90	0.99	1.85	44.47	8.12	8.14	9.57	50%
Isopropyl Alcohol/Powder Application Line 2	9.3	78.65%	68.0%	10.6%	74.7%	10.31%	0.02590	72.500	3.90	0.99	1.85	44.47	8.12	8.14	9.57	50%
Isopropyl Alcohol/Powder Application Line 3	9.3	78.65%	68.0%	10.6%	74.7%	10.31%	0.02590	72.500	3.90	0.99	1.85	44.47	8.12	8.14	9.57	50%

State Potential Emissions

Add worst case coating to all solvents

5.56 133.42 24.35 24.43

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)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	99.00%	5.56	133.42	24.35	0.24

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Insignificant Activities
Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adel Yousif/EVP
Date: October 5, 2001

1. Laminating - Cutting Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Credec 24-8169/1537 Frit Paint	n/a	8.00%	0.0%	8.0%	0.0%	92.00%	0.01520	131.000	n/a	n/a	0.16	3.82	0.70	0.00	0.00	100%
Credec 1537 Medium	7.7	80.00%	0.0%	80.0%	0.0%	20.00%	0.00122	131.000	6.16	6.16	0.13	3.07	0.56	0.00	30.80	100%
Ferro A3565/C32 Frit Paint	n/a	16.00%	0.0%	16.0%	0.0%	84.00%	0.05000	68.000	n/a	n/a	0.54	13.06	2.38	0.00	0.00	100%
Ferro C32 Medium	n/a	78.00%	0.0%	78.0%	0.0%	22.00%	0.00250	68.000	n/b	n/b	0.13	3.18	0.58	0.00	0.00	100%

0.96 23.13 4.22 0.00

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.96	23.13	4.22	0.00

2. Laminating - Autoclave Exhaust

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Dowanol	8.0	99.00%	0.0%	99.0%	0.0%	1.00%	0.00320	181.000	7.92	7.92	0.57	13.76	2.51	0.10	792.00	50%

0.57 13.76 2.51 0.10

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.57	13.76	2.51	0.10

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Aadel Youssif/EVP
Date: October 5, 2001

3. Tempering - F467 Black Frit Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Cookson Matheny 2T01M003/63/2003 Frit Paint	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.01635	434.000	n/a	n/a	0.00	0.00	0.00	0.00	0.00	100%
Cerdec 1518 Medium	n/a	74.00%	0.0%	74.0%	0.0%	26.00%	0.00012	434.000	n/a	n/a	0.04	0.89	0.16	0.00	0.00	100%

0.04 0.89 0.16 0.00

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.04	0.89	0.16	0.00

4. Tempering - F497 Black Frit Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Cookson Matheny 2T01M003/63/2003 Frit Paint	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.01635	125.000	n/a	n/a	0.00	0.00	0.00	0.00	0.00	100%
Cerdec 1518 Medium	n/a	74.00%	0.0%	74.0%	0.0%	26.00%	0.00012	125.000	n/a	n/a	0.01	0.26	0.05	0.00	0.00	100%

0.01 0.26 0.05 0.00

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.01	0.26	0.05	0.00

5. Tempering - Silver Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Englehard M571A high Amp	36.7	11.00%	0.0%	11.0%	0.0%	89.00%	0.01408	125.000	n/a	n/a	0.19	4.65	0.85	0.00	4.54	100%
Englehard M571A Low Amp	36.7	25.00%	0.0%	25.0%	0.0%	75.00%	0.00328	125.000	n/a	n/a	0.10	2.46	0.45	0.00	12.24	100%

0.30 7.11 1.30 0.00

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.30	7.11	1.30	0.00

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeeel Youssif/EVP
Date: October 5, 2001

6. Molding - Mezzanine A (Booths 3, 4, 7, 8 and 9)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Essex 43521, Channel Primer	7.0	98.10%	0.0%	98.1%	0.0%	0.00%	0.00017	136.000	6.88	6.88	0.02	0.54	0.10	0.00	FRR	100%
Chem Trend Mold Release CT 2002	6.4	99.00%	0.0%	99.0%	0.0%	1.00%	0.01230	26.000	6.36	6.36	0.32	7.60	1.39	0.05	636.17	50%

0.34 8.14 1.49 0.05

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.34	8.14	1.49	0.05

7. Molding - Mezzanine A (Booths 1, 2, 5 and 6)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Essex 43521, Channel Primer	7.0	98.10%	0.0%	98.1%	0.0%	0.00%	0.00017	136.000	6.88	6.88	0.02	0.54	0.10	0.00	FRR	100%

0.02 0.54 0.10 0.00

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.02	0.54	0.10	0.00

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001

7. Molding - Mezzanine B

Unit ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Booth 10	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 11	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 12	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 13	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 14	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%

2.10 50.40 9.20 2.25

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	2.10	50.40	9.20	2.25

8. Molding - Mezzanine C

Unit ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Booth 15	Chem Trend Mold Release RCTW-E2108	8.1	95.00%	65.0%	30.0%	65.0%	5.00%	0.03300	10.000	6.94	2.43	0.10	2.38	0.43	0.29	48.57	50%
Booth 16	Chem Trend Mold Release RCTW-E2108	8.1	95.00%	65.0%	30.0%	65.0%	5.00%	0.03300	10.000	6.94	2.43	0.10	2.38	0.43	0.29	48.57	50%
Booth 17	Chem Trend Mold Release RCTW-E2108	8.1	95.00%	65.0%	30.0%	65.0%	5.00%	0.03300	10.000	6.94	2.43	0.10	2.38	0.43	0.29	48.60	50%
Booth 18	Chem Trend Mold Release RCTW-E2108	8.1	95.00%	65.0%	30.0%	65.0%	5.00%	0.03300	10.000	6.94	2.43	0.10	2.38	0.43	0.29	48.60	50%
Booth 19	Chem Trend Mold Release RCTW-E2108	8.1	95.00%	65.0%	30.0%	65.0%	5.00%	0.03300	10.000	6.94	2.43	0.10	2.38	0.43	0.29	48.60	50%

State Potential Emissions

Add worst case coating to all solvents

0.50 11.88 2.17 1.46

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.50	11.88	2.17	1.46

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

Company Name: Guardian Automotive Products, Inc.
 Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
 Part 70 No.: 033-12745-00022
 Reviewer: Adael Yousif/EVP
 Date: October 5, 2001

9. GMT 800 Auto Prime Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/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
Essex 43518 Clear Primer	6.9	99.20%	0.0%	99.2%	0.0%	0.80%	0.00690	42.000	6.87	6.87	0.29	6.90	1.26	0.00	858.82	100%
Essex 43520A Black Primer	8.3	57.80%	0.0%	57.8%	0.0%	42.20%	0.00800	42.000	4.77	4.77	0.19	4.66	0.85	0.00	11.31	100%

0.48 11.56 2.11 0.00

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)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	0.48	11.56	2.11	0.00

**Appendix A: Emission Calculations
Insignificant Activities**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001**

10. Miscellaneous clean-up operations

VOC Emissions

Pollutant	Chemical	Maximum Usage (lb/yr)	Weight Percent VOC (%)	Potential emission rate per wet machine (TPY)
VOC	Windex	5870.000	3.60%	0.106
VOC	Denatured Alcohol	891.000	100.00%	0.446
VOC	Mold Cleaner	1503.000	100.00%	0.752
VOC	Lacquer Thinner	74.000	85.70%	0.032
Total VOC				1.334

NOx Emissions

Pollutant	Chemical	Maximum Usage (lb/yr)	Percent Emitted (%)	Potential emission rate per wet machine (TPY)
NOx	NOx Canisters for tempering furnaces	225.000	100.00%	0.113

HAPs Emissions

Pollutant	Chemical	Maximum Usage (lb/yr)	Weight Percent (%)	Potential emission rate per wet machine (TPY)
Methanol	Denature Alcohol	891.000	17.00%	0.076
2-Butoxyethanol	Windex	5870.000	5.00%	0.147
2-Butoxyethanol	Lacquer Thinner	74.000	5.00%	0.002
Toluene	Lacquer Thinner	74.000	70.00%	0.026
Total HAPs				0.250

METHODOLOGY

Emissions are based on material balance. Maximum material usage and VOC contents are provided by the source; 100% emission is assumed.

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x VOC content (%)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Laminating and Tempering Silkscreen Cleaning**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 5, 2001**

Insignificant Activity: Cleaning Operation

Pollutant	Maximum fluid usage (lb/hr)	VOC Emission Factor (lb VOC/lb solvent) *	VOC Content (%)	Potential emission (lb/hr)	Potential emission (TPY)
VOC	4.54	0.62	91.4	2.82	12.37

* Approximately 32% of the cleaning solvent used is recovered as a waste. Solvent contains 91.4% VOC; lb VOC / lb Solvent
Emission factor is based on material balance = $0.914 (1-0.32) = 0.622$

METHODOLOGY

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emission Factor (lb VOC/lb solvent)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations

**HAP Emission Calculations
Insignificant Activities**

Company Name: **Guardian Automotive Products, Inc.**
Address City IN Zip: **1900 S. Center Street, Auburn, IN 46706**
Part 70 No.: **033-12745-00022**
Date: **October 5, 2001**
Permit Reviewer: **Adeel Yousuf/EVP**

1. Laminating - Cutting Paint Room

Material	Density (Lb/Gal)	Pounds of Material (lb/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % MEK	Weight % Xylene	Weight % Glycol Ether	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Ferro A3565/C32 Frit Paint	n/a	0.050000	68.00	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	0.30
Ferro C32 Medium	n/a	0.002500	68.00	0.00%	0.00%	0.00%	0.00%	18.00%	0.00	0.00	0.00	0.00	0.13
Total													0.43
Total State Potential Emissions									0.00	0.00	0.00	0.00	0.43

2. Molding - Mezzanine A (Booths 3, 4, 7, 8 and 9)

Material	Density (Lb/Gal)	Pounds of Material (lb/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % MEK	Weight % Xylene	Weight % Glycol Ether	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Essex 43521, Channel Primer	7	0.000170	136.00	49.00%	49.00%	0.00%	0.00%	0.00%	0.05	0.05	0.00	0.00	0.00
Total													0.10
Total State Potential Emissions									0.05	0.05	0.00	0.00	0.00

3. Molding - Mezzanine A (Booths 1, 2, 5, and 6)

Material	Density (Lb/Gal)	Pounds of Material (lb/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % MEK	Weight % Xylene	Weight % Glycol Ether	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Essex 43521, Channel Primer	7	0.000170	136.00	49.00%	49.00%	0.00%	0.00%	0.00%	0.05	0.05	0.00	0.00	0.00
Total													0.10
Total State Potential Emissions									0.05	0.05	0.00	0.00	0.00

4. GMT 800 Auto Prime Line

Material	Density (Lb/Gal)	Pounds of Material (lb/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % MEK	Weight % Xylene	Weight % Glycol Ether	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Essex 43518 Clear Primer	6.9	0.006900	42.00	53.00%	47.00%	0.00%	0.00%	0.00%	0.67	0.60	0.00	0.00	0.00
Essex 43520A Black Primer	8.3	0.008000	42.00	10.00%	0.00%	45.00%	1.00%	0.00%	0.15	0.00	0.66	0.01	0.00
Total													2.09
Total State Potential Emissions									0.82	0.60	0.66	0.01	0.00

METHODOLOGY

HAPS emission rate (tons/yr) = Pounds of Material (lb/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 19, 2001**

Heat Input Capacity
MMBtu/hr
19.9

Potential Throughput
MMCF/yr
174.4

Facilities	MMBtu/hr
Flame breakout 55" line	0.01
Flame breakout 80" line	0.01
Shipping receiver space heater # 1	4.375
Shipping receiver space heater # 2	4.375
West Plant heating unit	2.187
Tack Oven # 2	0.83
North Plant heating unit	2.187
497 Furnace draft curtain	0.05
Engineering office heater	0.15
Water heater	0.032
Northeast air makeup unit	5.185
North office space heater	0.131
Center office space heater	0.26
South office space heater	0.131
Total	19.913

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.17	0.66	0.05	8.72	0.48	7.33

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100**

HAPs Emissions

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 19, 2001**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.832E-04	1.047E-04	6.541E-03	1.570E-01	2.965E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.361E-05	9.594E-05	1.221E-04	3.314E-05	1.832E-04

Methodology is the same as page 1.

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

**Appendix A: Emission Calculations
VOC
From Degreasing Operation**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-12745-00022
Reviewer: Adeel Yousuf/EVP
Date: October 19, 2001**

Insignificant Activity: Degreaser

Potential Emissions:											
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/day)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Safety Clean	Degreaser	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.175	0.05	1.17	0.21
Total Potential Emissions:									0.05	1.17	0.21

Methodology:

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/day) / 24 hrs/day

Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/day)

Potential VOC Tons per Year = Density (lb/gal) * Gal of Material (gal/day) * (365 days/yr) * (1 ton/2000 lbs)