



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

March 30, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant
RE: Guardian Automotive Trim, Inc. / 163-17881-00017
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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

March 29, 2004

Mark W. Bertram
Guardian Automotive Trim, Inc.
P. O. Box 5109
Evansville, IN 47716-5109

Re: 163-17881-00017
Significant Permit Modification to
Part 70 Permit 163-6502-00017

Dear Mr. Bertram:

Guardian Automotive Trim, Inc. was issued a Part 70 operation permit on January 19, 1999 for an automotive trim manufacturing plant located at 601 N. Congress Avenue, Evansville, IN 47715-2448. An application to modify the source was received on June 26, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification was made to change permit language relating to the operation of the regenerative thermal oxidation unit controlling VOC emissions from the robotic spray coating line identified as H20.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

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

Attachments
ARD

cc: File - Vanderburgh County
U.S. EPA, Region V
Vanderburgh County Health Department
Evansville Environmental Protection Agency
IDEM - Southwest Regional Office
Air Compliance Section Inspector - Scott Anslinger
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and
CITY OF EVANSVILLE EPA**

**Guardian Automotive Trim, Inc.
601 North Congress Avenue
Evansville, Indiana 47715**

(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 and 326 IAC 2-1-3.2 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.: T163-6502-00017	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 19, 1999
1 st Significant Source Modification 163-10592-00017	Issuance Date: June 24, 1999
1 st Administrative Amendment 163-11080-00017	Issuance Date: July 26, 1999
2 nd Administrative Amendment 163-11523-00017	Issuance Date: November 29, 1999
1 st Minor Source Modification 163-11437-00017	Issuance Date: December 21, 1999
1 st Significant Permit Modification 163-11558-00017	Issuance Date: February 14, 2000
3 rd Administrative Amendment 163-11681-00017	Issuance Date: February 15, 2000
2 nd Significant Source Modification 163-12662-00017	Issuance Date: January 25, 2001
4 th Administrative Amendment 163-14005-00017	Issuance Date: December 27, 2001
1 st Reopening 163-13502-00017	Issuance Date: March 13, 2002
5 th Administrative Amendment 163-15965-00017	Issuance Date: August 28, 2002
2 nd Significant Permit Modification 163-17881-00017	<i>(Pages were renumbered as 1 through 62)</i> Pages Amended: 2-5, 11-14, 17-20, 25-27, 30, 32, 36-38, 46-52
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 29, 2004

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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) and City of Evansville EPA. 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)]

The Permittee owns and operates a stationary automotive decorative trim coating operation.

Responsible Official: David Bacon
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
SIC Code: 3089
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) One (1) Department 23 high gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-1, consisting of five (5) spray booths (HVLP, its equivalent or better (e.g., electrostatic)) (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B);
- (2) One (1) Department 23 low gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-2, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths (23-9B, 23-10B, 23-11B and 23-12B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-9B, 23-10B, 23-11B, 23-12B and 23-1H);
- (3) One (1) Department 13 (formerly Department 14) air atomization hand spray coating booth, coating plastic parts, constructed before 1980, no identification number assigned (formerly 14-1B), using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (no identification number assigned (formerly 14-1B)) and three (3) Department 13 automatic paint machines, identified as 13-7, 13-8, and 13-9, coating plastic parts, constructed before 1980, using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-1A, 13-2A, and 13-3A);
- (4) One (1) Department 13 hand spray coating line, coating plastic parts, constructed before 1980, identified as U13-1, consisting of three (3) air atomization spray booths (13-7B, 13-8B and 13-9B), spray booth 13-7B using a water back booth for Particulate Matter (PM) control and spray booths 13-8B and 13-9B using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-7B, 13-8B and 13-9B);
- (5) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-2, using a water back booth for Particulate Matter (PM) control, exhausting to one (1) stack (13-6B);

- (6) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-3, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-5B);
- (7) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-4, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-3B);
- (8) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-5, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-2B);
- (9) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-6, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-1B);
- (10) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-1, consisting of two (2) air atomization spray booths (22R-1B and 22R-2B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-1B and 22R-2B);
- (11) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-2, consisting of two (2) air atomization spray booths (22R-3B and 22R-4B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-3B and 22R-4B);
- (12) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-1, consisting of four (4) air atomization spray booths (20-1B, 20-2B, 20-3B and 20-4B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-1B, 20-2B, 20-3B and 20-4B);
- (13) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-2, consisting of two (2) air atomization spray booths (20-5B and 20-6B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-5B and 20-6B);
- (14) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-3, consisting of two (2) air atomization spray booths (20-7B and 20-8B), spray booth 20-7B using fabric filters for Particulate Matter (PM) control and spray booth 20-8B using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (20-7B and 20-8B);
- (15) One (1) Department 20 air atomization spray booth, coating plastic parts, constructed before 1980, identified as U20-4, using a water back booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-9B);
- (16) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-3, consisting of two (2) air atomization spray booths (22R-5B and 22R-6B), each using a water back booth for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-5B and 22R-6B);
- (17) Two (2) air atomization spray coating booths, coating plastic parts, now located in storage, constructed before 1980, formerly identified as 20C-6B and 20C-7B, using a water back booth for Particulate Matter (PM) control;

- (18) One (1) Department 15 air atomization spray coating booth, coating plastic parts, constructed before 1980, identified as U15-1, using a fabric filter for Particulate Matter (PM) control, exhausting to one (1) stack (15-1B);
- (19)
 - (a) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);
 - (b) One (1) new decorative chrome electroplating line, using a wetting agent for Particulate Matter (PM) and chromic emissions control; and
 - (c) Seven (7) Vannaire's scrubbers, IDS1 through S7 which are voluntarily installed to control the water vapor from the plating line, that causes corrosion to process equipment and building roofs.
- (20) One (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth, coating plastic parts, constructed in 1997, identified as 20-12B, using a water wash booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-12B); and
- (21) Two (2) Department 25 air atomization spray coating booths, coating plastic parts, constructed before 1980, identified as 25S-1B and 25S-4B, each using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (25S-1B and 25S-4B).
- (22) One (1) new natural gas-fired boiler, with a heat input rate not to exceed 19 million British Thermal Units per hour (mmBtu/hr); and
- (23) Five (5) new natural gas-fired air make-up units, with a total heat input rate not to exceed 36 mmBtu/hr.
- (24) One (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths, each using water wash for Particulate Matter (PM) control, utilizing a regenerative thermal oxidizer as control and exhausting to stack RTOE. The regenerative thermal oxidizer has a heat input of 2 mmBtu per hour, a 90% overall collection efficiency, and exhausts to stack RTOE.

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):

- (1) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 8.728 million British thermal units per hour (mmBtu/hr).

- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (3) Two (2) new etch tanks, where plastic parts are roughened or microfine etches are made by dipping the parts into a chromium and sulfuric acid solution to enhance the adhesion of chromium in the electroplating, with a total maximum usage rate of 62 pounds per hour (lbs/hr), of chromium and sulfuric acid solution controlled by one (1) new wet scrubber #1.
- (4) One (1) new nitric acid strip tank, with a maximum rate of 3 lb/hr. This is where coated racks are stripped, controlled by one (1) new wet scrubber #2.

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 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and City of Evansville EPA.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by City of Evansville EPA.

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

- (b) The Permittee shall furnish to IDEM, OAQ, and City of Evansville EPA within a reasonable time, any information that IDEM, OAQ, and City of Evansville EPA 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, and City of Evansville EPA copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, and City of Evansville EPA along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 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 constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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 certification 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 April 15 of each year 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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

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, and City of Evansville EPA on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and City of Evansville EPA 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.12 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 (PMP) 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 units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and City of Evansville EPA upon request and shall be subject to review and approval by IDEM, OAQ, and City of Evansville EPA.

B.13 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:
- (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. Reasonable steps to minimize the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and City of Evansville EPA 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

City of Evansville EPA Telephone Number: 812-426-5597

City of Evansville EPA Facsimile Number: 812-426-7344

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency 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

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

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. Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to

examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of 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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and City of Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and City of Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (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. Reasonable steps to minimize the level of emissions may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency. Reasonable steps to correct the emergency may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.
 - (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.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and City of Evansville EPA 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.

- (d) 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.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, and City of Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, and City of Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 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.

B.16 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 Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, and City of Evansville EPA 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, and City of Evansville EPA 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, and City of Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, and City of Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 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 City of Evansville EPA 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).

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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

- (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, and City of Evansville EPA on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAQ, and City of Evansville EPA 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, and City of Evansville EPA 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, and City of Evansville EPA 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, and City of Evansville EPA 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.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (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.20 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(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 approval required by 326 IAC 2-1 and MCE 3.30.18 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

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

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, and City of Evansville EPA in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) 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 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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, and City of Evansville EPA 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, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, 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.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, and City of Evansville EPA or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, and City of Evansville EPA nor an authorized representative, may disclose the information unless and until IDEM, OAQ, and City of Evansville EPA makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, IDEM, OAQ, and City of Evansville EPA acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and City of Evansville EPA within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).

- (c) IDEM, OAQ, and City of Evansville EPA shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and City of Evansville EPA within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six 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 and MCE 3.30.18.214. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2][326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) or MCE 3.30.18.212. 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
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 units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

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

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

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 methods 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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ and City of Evansville EPA within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ and City of Evansville EPA, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

- (c) Will comply with such applicable requirements that become effective during the term of this permit.

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

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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

in writing, prior to the end of the 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).

C.11 Monitoring Methods [326 IAC 3]

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

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

C.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 14, 1997.
- (b) If the ERP is disapproved by IDEM, OAQ, and City of Evansville EPA the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) 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.
- (d) 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.

- (e) Upon direct notification by IDEM, OAQ, and City of Evansville EPA 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the 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); and
 - (3) A verification to IDEM, OAQ, and City of Evansville EPA that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, and City of Evansville EPA that the Risk Management Plan is being properly implemented.

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.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ and City of Evansville EPA upon request and shall be subject to review and approval by IDEM, OAQ, and City of Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

C.15 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, and City of Evansville EPA within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ and City of Evansville EPA within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ and City of Evansville EPA reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.16 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 April 15 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 actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. 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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

- (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, and City of Evansville EPA on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and City of Evansville EPA may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and City of Evansville EPA representative, 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 or Evansville EPA makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) 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)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

City of Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960
- (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, and City of Evansville EPA on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

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

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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)]

- (1) One (1) Department 23 high gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-1, consisting of five (5) spray booths (HVLP, its equivalent or better (e.g., electrostatic)) (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B);
- (2) One (1) Department 23 low gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-2, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths (23-9B, 23-10B, 23-11B and 23-12B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (23-9B, 23-10B, 23-11B, 23-12B and 23-1H);
- (3) One (1) Department 13 (formerly Department 14) air atomization hand spray coating booth, coating plastic parts, constructed before 1980, no identification number assigned (formerly 14-1B), using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (no identification number assigned (formerly 14-1B)) and three (3) Department 13 automatic paint machines, identified as 13-7, 13-8, and 13-9, coating plastic parts, constructed before 1980, using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-1A, 13-2A, and 13-3A);
- (4) One (1) Department 13 hand spray coating line, coating plastic parts, constructed before 1980, identified as U13-1, consisting of three (3) air atomization spray booths (13-7B, 13-8B and 13-9B), spray booth 13-7B using a water back booth for Particulate Matter (PM) control and spray booths 13-8B and 13-9B using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-7B, 13-8B and 13-9B);
- (5) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-2, using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, exhausting to one (1) stack (13-6B);
- (6) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-3, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-5B);
- (7) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-4, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-3B);
- (8) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-5, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-2B);
- (9) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-6, using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (13-1B);
- (10) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-1, consisting of two (2) air atomization spray booths (22R-1B and 22R-2B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-1B and 22R-2B);
- (11) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-2, consisting of two (2) air atomization spray booths (22R-3B and 22R-4B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-3B and 22R-4B);
- (12) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-1, consisting of four (4) air atomization spray booths (20-1B, 20-2B, 20-3B and 20-4B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (20-1B, 20-2B, 20-3B and 20-4B);

- (13) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-2, consisting of two (2) air atomization spray booths (20-5B and 20-6B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (20-5B and 20-6B);
- (14) One (1) Department 20 paint line, coating plastic parts, constructed before 1980, identified as U20-3, consisting of two (2) air atomization spray booths (20-7B and 20-8B), spray booth 20-7B using fabric filters for Particulate Matter (PM) control and spray booth 20-8B using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (20-7B and 20-8B);
- (15) One (1) Department 20 air atomization spray booth, coating plastic parts, constructed before 1980, identified as U20-4, using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, exhausting to one (1) stack (20-9B);
- (16) One (1) Department 22 robotic spray coating line, coating plastic parts, constructed before 1980, identified as U22R-3, consisting of two (2) air atomization spray booths (22R-5B and 22R-6B), each using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, each exhausting to one (1) stack (22R-5B and 22R-6B);
- (17) Two (2) air atomization spray coating booths, coating plastic parts, now located in storage, constructed before 1980, formerly identified as 20C-6B and 20C-7B, using a water back booth or a rotary finishing cell for Particulate Matter (PM) control;
- (18) One (1) Department 15 air atomization spray coating booth, coating plastic parts, constructed before 1980, identified as U15-1, using a fabric filter for Particulate Matter (PM) control, exhausting to one (1) stack (15-1B);
- (20) One (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth, coating plastic parts, constructed in 1997, identified as 20-12B, using a water back booth or a rotary finishing cell for Particulate Matter (PM) control, exhausting to one (1) stack (20-12B); and
- (21) Two (2) Department 25 air atomization spray coating booths, coating plastic parts, constructed before 1980, identified as 25S-1B and 25S-4B, each using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (25S-1B and 25S-4B).

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

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

- (a) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit CP 163-2106-00017, issued April 3, 1992, the Best Available Control Technology (BACT) shall consist of the following for the one (1) Department 23 high gloss robotic spray coating line (U23-1) and the one (1) Department 23 low gloss robotic spray coating line (U23-2):
 - (1) The use of high volume, low pressure (HVLP) applicators;
 - (2) The use of the solventless mask washers;
 - (3) The use of solventless boothcoat; and
 - (4) An annual report must be submitted to the Evansville Environmental Protection Agency on the feasibility of the use of water-based coatings or any other method of reducing VOC emissions.

- (b) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit CP163-8311-00017, issued July 19, 1997 and amended (A163-9900) on August 7, 1998, the potential to emit Volatile Organic Compound (VOC) is limited to twenty-four (24) tons per 12 month period for the one (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth (20-12B). Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements) will not apply.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to Construction Permit CP163-2106-00017 issued April 3, 1992, the following requirements will make the one (1) Department 23 high gloss robotic spray coating line and the one (1) Department 23 low gloss robotic spray coating line not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration):

- (a) The amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 246 tons per 12 month consecutive period, rolled on a monthly basis.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control devices in accordance with manufacturer's specifications. The requirement to operate the control devices is not federally enforceable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), and the one (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth (20-12B).

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) or Particulate Matter (PM) limits specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, and City of Evansville EPA reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1(b) and D.1.2(a) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(d), each particulate matter control device shall be in operation at all times when the emission unit that it controls is in operation. The requirement to operate the control devices is not federally enforceable.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks of surface coating booths using dry filters (formerly 14-1B, 13-1A, 13-2A, 13-3A, 13-8B, 13-9B, 13-5B, 13-3B, 13-2B, 13-1B, 20-7B, 15-1B, 25S-1B and 25S-4B) while one or more of the booths are in operation.
- (b) Monthly inspections shall be performed of the coating emissions from all stacks and the presence of overspray on the rooftops and the nearby ground.
- (c) 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.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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 Condition D.1.1 and D.1.2.
- (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 cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(b) and D.1.2(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (19) (a) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);
- (b) One (1) new decorative chrome electroplating line, using a wetting agent for Particulate Matter (PM) and chromic emissions control; and
- (c) Seven (7) Vannaire's scrubbers, IDS1 through S7 which are voluntarily installed to control the water vapor from the plating line, that causes corrosion to process equipment and building roofs.

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

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.2.2 Chromium Electroplating NESHAP [326 IAC 20-8-1][40 CFR Part 63, Subpart N]

This facility is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached.

- (a) During tanks operation, the Permittee shall control chromium emissions discharged to the atmosphere from the electroplating lines by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tanks.
- Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.
- (b) The following work practice standards for the tanks are also applicable:
- (1) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.4.
 - (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.2.4.
 - (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.

- (4) Based on the results of the determination made under Condition D.2.2(b)(3) above, IDEM, OAM may require that the Permittee make changes to the OMP. Revisions may be required if IDEM, OAM finds that the plan:
 - (A) Does not address a malfunction that has occurred;
 - (B) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant), or process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
 - (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the electroplating line.

D.2.4 Operation and Maintenance Plan [326 IAC 20-8-1] [40 CFR 63.342(f)(3)]

- (a) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3), shall be prepared and implemented no later than the compliance date. The OMP shall specify the operation and maintenance criteria for the electroplating line, fume suppressant, and monitoring equipment, and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the stalagmometer;
 - (2) A standardized checklist to document the operation and maintenance criteria for the tanks, fume suppressant, and monitoring equipment;
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
 - (4) A systematic procedure for identifying malfunctions of the tanks, fume suppressant, and monitoring equipment; and for implementing corrective actions to address such malfunctions;
- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs.
- (c) Recordkeeping associated with the OMP is identified in Condition D.2.7. Reporting associated with the OMP is identified in Condition D.2.8.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63.344]

Initial compliance tests shall be performed for the new decorative electroplating line in item (19)(b) of the Facility Description Table of this Section in order to determine compliance with the emission limitations of 0.01 milligram per dry standard cubic feet (mg/dscf), or verify the 45 dynes/cm maximum surface tension of the bath, which corresponds to the 0.01 mg/dscf emission limitations. This tests shall be made upon start-up.

D.2.6 Monitoring to Demonstrate Continuous Compliance [326 IAC 20-8-1] [40 CFR 63.343 (c)(5) & (7)]

The Permittee shall monitor the surface tension of the electroplating baths in the electroplating lines. Operation of either tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:

- (a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensionmeter as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities).
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM until an exceedance occurs.

The source agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.

- (c) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.2.6(b) above.
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.2.6(b) above.
- (e) Operating time for chromium electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.

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

D.2.7 Record Keeping Requirements [326 IAC 20-8-1] [40 CFR 63.346]

- (a) The Permittee shall maintain records to document compliance with Conditions D.2.2 and D.2.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, be kept for a period of five (5) years, and include a minimum of the following:
 - (1) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard, i.e., surface tension of the bath in each tank, including the date and time the data are collected.

- (2) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs.
 - (3) The total process operating time of each tank, not both combined, during the reporting period.
 - (4) Records of the date and time that fume suppressants are added to the electroplating bath(s).
 - (5) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.2.8.
- (b) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of the tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

D.2.8 Reporting Requirements [326 IAC 20-8-1] [40 CFR 63.345 & 63.347]

- (a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM prior to any change, modification, or reconstruction of the facility (including conducting electroplating operations that fall under the definition of hard chromium electroplating) or construction of a new facility or source. Notification shall be submitted as soon as practicable, but at least thirty (30) days before the date construction or reconstruction commences.
- (b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.
- (c) The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled "Performance Testing" of this permit.
- (d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP required in Condition D.2.4, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the OMP. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
- (e) The Permittee shall submit a summary report to document the ongoing compliance status of the facility using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.

- (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.
- (2) If the monitoring data collected by the Permittee in accordance with Condition D.2.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

SECTION D.2a FACILITY OPERATION CONDITIONS

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

- (22) One (1) new natural gas-fired boiler, with a heat input rate not to exceed 19 million British Thermal Units per hour (mmBtu/hr); and
- (23) Five (5) new natural gas-fired air make-up units, with a total heat input rate not to exceed 36 mmBtu/hr.

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

D.2a.1 Particulate Matter for Indirect Heating (PM) [326 IAC 6-2]

Pursuant to this 326 IAC 6-2-4, the particulate matter emissions from the new boiler with a heat input rate not to exceed 19 mmBtu/hr shall not exceed 0.43 pounds per million Btu. This PM limit shall be determined using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of PM emitted per mmBtu heat input
Q = Total source operating capacity rating, mmBtu/hr

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.2a.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2a.3 New Source Performance Standards (NSPS) 40 CFR § 60.48, Subpart Dc

Pursuant to 40 CFR § 60.48c, Subpart Dc, Subsections (a), (g) and (i), the new natural gas-fired boiler with a heat input rate not to exceed 19 mmBtu/hr shall comply with the following requirements:

- (a) Under Subsection (a) of § 60.48c, the Permittee shall submit notification of the date of construction, or reconstruction, anticipated startup and actual startup of the new boiler as provided by 40 CFR § 60.7. The notification shall include:
 - (1) The design heat input capacity of the new boiler and identification of the fuel to be combusted; and
 - (2) the annual capacity factor at which the Permittee anticipates operating the new boiler, based on all fuels fired and based on each individual fuel fired.
- (b) Under Subsection (g) of § 60.48c, the Permittee shall maintain records of the amounts of each fuel combusted during each month for the new boiler.
- (c) Under Subsection (i) of § 60.48c, all records required by § 60.48c shall be maintained by the Permittee for the new boiler for a period of two (2) years following the date of such record.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (1) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 8.728 million British thermal units per hour (mmBtu/hr).

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

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to this 326 IAC 6-2-3(e), the particulate matter emissions from the boilers (Boiler #1 (constructed in 1964) and Boiler #2 (constructed in 1968)) shall not exceed 0.60 pounds per million Btu. This limitation is used because the calculated limitation was greater than 0.60 pounds per million Btu.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.3 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification, as specified in 326 IAC 2-1, may require these facilities to have monitoring requirements.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Department 23 high gloss robotic spray coating booth (Adhesion Promoter Booth), identified as 23-13B, coating plastic parts, constructed in 1999, consisting of a spray application system (HVLP, its equivalent or better (e.g., electrostatic)), using a water back booth or a rotary finishing cell for Particulate Matter control, exhausting to one (1) stack (23-13B). This new booth will be added to existing Department 23 high gloss robotic spray coating line (U23-1).
- (b) Four (4) new application guns (HVLP, its equivalent or better (e.g., electrostatic)) and four (4) water back booths or rotary finishing cells for particulate matter control to replace the application guns and the water back booths in Department 23 high gloss robotic spray coating line (U23-1).

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements, the Best Available Control Technology (BACT) shall consist of the following for the one (1) Department 23 high gloss robotic spray coating booth (23-13B):
- (1) The use of high volume, low pressure (HVLP) applicators, its equivalent or better (e.g., electrostatic);
 - (2) The use of the solventless mask washers;
 - (3) The use of solventless boothcoat; and
 - (4) An annual report must be submitted to the Evansville Environmental Protection Agency on the feasibility of the use of water-based coatings or any other method of reducing VOC emissions.

D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the following requirements will make the one (1) Department 23 high gloss robotic spray coating line and the one (1) Department 23 low gloss robotic spray coating line not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration):

- (a) The amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 246 tons per 12 month consecutive period, rolled on a monthly basis.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) Department 23 high gloss robotic spray coating booth (23-13B).

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) or Particulate Matter (PM) limits specified in Conditions D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, and City of Evansville EPA reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.7 VOC Emissions

Compliance with Condition D.4.2(a) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(d), the particulate matter control device shall be in operation at all times the robotic spray coating booth (23-13B) is in operation.

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

D.4.9 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (b) 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.

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

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) 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 Condition D.4.1 and D.4.2.
- (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 cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.9, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

- (24) One (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20, consisting of four (4) High Volume Low Pressure (HVLP) spray booths, each using water wash for Particulate Matter (PM) control, utilizing a regenerative thermal oxidizer as control and exhausting to stack RTOE. The regenerative thermal oxidizer has a heat input of 2 million British thermal units (mmBtu) per hour, and exhausts to stack RTOE.

(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.5.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the one (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20 shall be:

- (a) The use of a regenerative thermal oxidizer that maintains a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 90.0%.
- (b) The VOC content delivered to the spray coating line H20 shall be limited to less than 228.88 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 22.89 tons per twelve (12) consecutive month period.

D.5.2 New Source Toxics Control [326 IAC 2-4.1-1]

- (a) HAP emissions from the one (1) high gloss and low gloss robotic spray coating line, shall be controlled by the regenerative thermal oxidizer, to assure the single HAP and total HAPs emissions are maintained at less than 10 and 25 tons, respectively, per 12 month consecutive period. This requirement will render the requirements of 326 IAC 2-4.1-1 not applicable.
- (b) The any single HAP content delivered to the spray coating line H20 shall be limited to less than 85.24 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of any single HAP content to less than 8.52 tons per twelve (12) consecutive month period.
- (c) The total HAP content delivered to the spray coating line H20 shall be limited to less than 155.45 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of total HAP content to less than 15.54 tons per twelve (12) consecutive month period.

D.5.3 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

The controlled VOC potential emissions from this facility are less than 40 tons per year. Therefore, the PSD requirement in 326 IAC 2-2 (PSD) does not apply. Any change or modification which may increase VOC potential emissions to 40 tons per year or more from this facility shall obtain OAQ approval before such change may occur.

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications at all times when the robotic spray coating line is in operation. The requirement to operate the control devices is not federally enforceable.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.5.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.5.7 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP content and usage limitations in order to demonstrate the compliance of Conditions D.5.1, D.5.2 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.8 Regenerative Thermal Oxidizer

- (a) In order to demonstrate compliance with D.5.1, the regenerative thermal oxidizer shall be operated at all times that the spray painting process is in operation, unless the regenerative thermal oxidizer cannot be operated due to an emergency as set forth in Condition B.13, Emergency Provisions. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500°F during operation until a temperature and duct pressure have been determined from the most recent compliant stack test, as approved by IDEM. The determined temperature and duct pressure shall correlate to a minimum overall VOC control efficiency of 90.0%.
- (b) With respect to Conditions B.13(b)(3) and (g)(1), "reasonable steps to minimize the level of emissions" may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency.
- (c) With respect to Conditions B.13(b)(6) and (g)(1), "reasonable steps to correct the emergency" may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.

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

D.5.9 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation. The exhaust fan shall be operated such that the duct pressure is within the range determined to maintain a minimum 90.0% overall control efficiency (including capture and destruction efficiencies) of VOC emissions from the robotic spray coating line.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. 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.

D.5.10 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (b) 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.

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

D.5.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.2, D.5.3 and D.5.9, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits and/or the HAP emission limits:
 - (1) The amount and VOC and HAP 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 cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period;
 - (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (7) Weekly records of the duct pressure.
- (b) To document compliance with Condition D.5.10, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and City of Evansville EPA**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017

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:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- 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:

Date:

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

AND CITY OF EVANSVILLE EPA

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input checked="" type="radio"/>	1. 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
<input checked="" type="radio"/>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND CITY OF EVANSVILLE EPA
Part 70 Quarterly Report**

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017
Facility: One (1) Department 20 HVLP paint spray booth (20-12B)
Parameter: Volatile Organic Compound (VOC)
Limit: 24 tons VOC per 12 month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage this Month	VOC usage previous 11 Months	VOC usage 12 Month Total

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND CITY OF EVANSVILLE EPA**

Part 70 Quarterly Report

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017
Facility: Dept. 23 high gloss and Dept 23 low gloss coating lines
Parameter: Volatile Organic Compound (VOC)
Limit: The amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 246 tons per 12 month consecutive period, rolled on a monthly basis.

YEAR: _____

Month	Solvent Usage this Month (tons)	Solvent Usage Past 12 months (tons)

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

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

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

**PART 70 OPERATING PERMIT
 CHROMIUM ELECTROPLATING NESHAP
 ONGOING COMPLIANCE STATUS REPORT**
(Complete this form for each affected tank)

Source Name: Guardian Automotive Trim, Inc.
 Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
 Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
 Part 70 Permit No.: T163-6502-00017

Tank ID #: _____
 Type of process: Decorative
 Monitoring Parameter: Surface tension of the electroplating bath
 Parameter Value: 45 dynes per centimeter
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
 The frequency for completing this report may be altered by the IDEM, OAQ, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period,
 and retain on site unless otherwise notified.

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**MINOR SOURCE MODIFICATION AND PART 70 OPERATING PERMIT
 CHROMIUM ELECTROPLATING NESHAP
 ONGOING COMPLIANCE STATUS REPORT**

Source Name: Guardian Automotive Trim, Inc.
 Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
 Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
 Part 70 Permit No.: T163-6502-00017
 1st Significant Permit Modification: 163-11558-00017
 Tank ID #: _____
 Type of process: New Decorative Chrome Electroplating Line
 Monitoring Parameter: Surface tension of the electroplating bath
 Limits: 45 dynes per centimeter, which corresponds to the chromium concentration limit of 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
 The frequency for completing this report may be altered by the IDEM, OAM, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

9

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

9

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

AND CITY OF EVANSVILLE EPA

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

Source Name: Guardian Automotive Trim, Inc.
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109
Part 70 Permit No.: T163-6502-00017

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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
Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Guardian Automotive Trim, Inc.
Source Location:	601 N. Congress Avenue, Evansville, IN 47715-2448
County:	Vanderburgh
SIC Code:	3089
Operation Permit No.:	163-6502-00017
Operation Permit Issuance Date:	January 19, 1999
Revision No.:	163-17881-00017
Permit Reviewer:	Allen R. Davidson

On September 25, 2003, the Office of Air Quality (OAQ) had a notice published in the *Evansville Courier* stating that Guardian Automotive Trim, Inc. had made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Significant Permit Modification to a Part 70 Permit. The permit modification involved a change in permit language relating to the operation of the regenerative thermal oxidation (RTO) unit controlling volatile organic compound (VOC) emissions from the robotic spray coating line identified as H20. The notice also stated that OAQ proposed to issue the permit modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Derrick J. Ohning of the Evansville Environmental Protection Agency submitted comments on the proposed modification. The summary of the comments and OAQ responses are as follows:

Comment 1:

In the Notice and throughout the permit, the address of the Evansville EPA should be:

Evansville Environmental Protection Agency
C. K. Newsome Center
100 East Walnut Avenue [sic], Ste. 100
Evansville, IN 47713

Response 1:

All instances in the permit of:

Room 250
101 N.W. Martin Luther King, Jr. Blvd
Evansville, Indiana 47708

have been changed to read:

C.K. Newsome Community Center
100 E. Walnut St. Ste. 100
Evansville IN 47713-1960

Comment 2:

The requirement for recording fan speed and duct pressure seems redundant as one is directly related to the other. It would appear that maintaining one of these requirements in addition to temperature would ensure compliance.

Response 2:

In the draft phase of SPM 163-17881-00017, OAQ removed the requirements to maintain fan speed within any range when the requirements to monitor duct pressure were added. Guardian Automotive Trim, Inc. will have flexibility to run at any fan speed, provided the speed maintains operating temperature and duct pressure within parameters.

The original proposal of Guardian Automotive Trim, Inc. in this application (SPM 163-17881-00017) was for language stating that both duct pressure and fan speed would be monitored, and that both would need to be out of range before a deviation would occur. However, this proposal was unacceptable to OAQ. It produced a scenario where any duct pressure reading that was out of range could be eliminated from being classifiable as a deviation solely by virtue of operating the fan at a normal speed, rendering the monitoring as ineffective for determining overall compliance. It is the intent of OAQ that regardless of the fan speed, if air flow is insufficient to provide adequate capture efficiency, that it be classifiable as either a deviation, malfunction or emergency.

The permit has been changed to also remove the monitoring and record keeping requirements related to fan speed, as follows:

D.5.8 Regenerative Thermal Oxidizer

- (a) In order to demonstrate compliance with D.5.1, the regenerative thermal oxidizer shall be operated at all times that the spray painting process is in operation, unless the regenerative thermal oxidizer cannot be operated due to an emergency as set forth in Condition B.13, Emergency Provisions. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500°F during operation until a temperature; ~~and duct pressure and fan speed in Hertz~~ have been determined from the most recent compliant stack test, as approved by IDEM. The determined temperature and duct pressure shall correlate to a minimum overall VOC control efficiency of 90.0%.
- (b) With respect to Conditions B.13(b)(3) and (g)(1), "reasonable steps to minimize the level of emissions" may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency.
- (c) With respect to Conditions B.13(b)(6) and (g)(1), "reasonable steps to correct the emergency" may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.

D.5.9 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

- (b) The ~~fan speed in Hertz and the~~ duct pressure shall be observed ~~together~~ at least once per week when the thermal oxidizer is in operation. ~~This~~ **The exhaust fan speed in Hertz** shall be ~~maintained~~ **operated** such that the duct pressure is within the range, ~~as established in most recent compliant stack test,~~ **determined** to maintain a minimum 90.0% overall control efficiency (including capture and destruction efficiencies) of VOC emissions from the robotic spray coating line.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. 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.

D.5.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.2, D.5.3 and D.5.9, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits and/or the HAP emission limits:
- (1) The amount and VOC and HAP 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 cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period;
 - (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (7) Weekly records of ~~the fan speed in Hertz and the~~ duct pressure.
- (b) To document compliance with Condition D.5.10, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3:

If future stack testing were performed at the maximum fan speed, and at least 90% VOC destruction was demonstrated, all fan speeds less than maximum would be acceptable (at constant temperature) since slower fan speeds only serve to increase dwell time, and increase destruction efficiency. Therefore monitoring of fan speed or duct pressure would not be necessary to ensure compliance, as long as a minimum speed is established to ensure complete capture of emissions from the controlled process.

Response 3:

OAQ acknowledges that in the instance of total capture, which can be achieved by a permanent total enclosure, it would not be necessary to monitor fan speed or duct pressure. However, there is not a permanent total enclosure and less than 100% capture efficiency in the case of the robotic spray coating line.

The permit requires 90% overall removal efficiency, not 90% destruction efficiency alone. Overall removal efficiency is a factor of both capture and destruction efficiency. A lower fan speed or duct pressure would increase residence time, thus improving destruction efficiency. However, a fan speed or duct pressure that is too low would lower the capture efficiency. If the capture efficiency was reduced more than the destruction efficiency was improved, the overall removal efficiency would decrease.

Comment 4:

Although the intent of Condition D.5.8(a) is understood and enforceable, we believe that the terminology could be more specific. The fan speed is presumably adjusted using a variable-speed drive, or Variable-Frequency Drive (VFD), which operates on the principle of varying the frequency of its output, which in turn varies the speed of the motor (fan). Thus, the frequency monitored in this case is an indirect indication of the fan speed.

Guardian may be reporting "fan speed" in the range of 50 to 60 Hertz, taken literally would be equivalent to 3000 to 3600 RPM (60 cycles/second), which may or may not be the case. The frequency being reported is actually the input frequency to the fan motor and not the fan speed, which is determined further by the phase, number of poles, etc. So at 50 Hertz, the fan speed would be 83% (50/60) of the maximum speed, whatever that may be. Likewise, if Guardian were to later change the fan motor to one with a different RPM rating, the same reported fan speed in Hertz would actually be a different speed than with the previous motor.

Therefore, a different description of this parameter is suggested, such as: "...attenuated fan speed, as indicated by the Variable-Frequency Drive output in Hertz ...".

If IDEM deems this change warranted, other references to this term can be found in D.5.9(b) and D.5.11(a)(7).

Response 4:

OAQ removed the requirements to maintain fan speed within any range when the requirements to monitor duct pressure were added. For this reason, highly descriptive information about the fan speed is not needed. If Guardian Automotive Trim, Inc. wishes to install a different fan motor or fan blade in the future, the change could be made without changing any permit conditions. The new equipment only needs to be able to maintain the existing established operating temperature and duct pressure parameters.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Guardian Automotive Trim, Inc.
Source Location:	601 N. Congress Avenue, Evansville, IN 47715-2448
County:	Vanderburgh
SIC Code:	3089
Operation Permit No.:	163-6502-00017
Operation Permit Issuance Date:	January 19, 1999
Application No.:	163-17881-00017
Permit Reviewer:	Allen R. Davidson

On June 26, 2003, the Office of Air Quality (OAQ) received an application from Guardian Automotive Trim, Inc. requesting a change in permit language relating to the operation of the regenerative thermal oxidation unit controlling VOC emissions from the robotic spray coating line identified as H20.

History

Guardian Automotive Trim, Inc. was issued a Part 70 permit (163-6502-00017) for an automotive trim manufacturing plant on January 19, 1999. The emission source has since received the following revisions:

- (a) 1st Significant Source Modification 163-10592-00017, which approved construction of a fifth spray booth and new equipment for four existing booths in an existing robotic spray coating line, was issued on June 24, 1999.
- (b) 1st Administrative Amendment 163-11080-00017, which approved operation of the equipment in Significant Source Modification 163-10592-00017, was issued on July 26, 1999.
- (c) 2nd Administrative Amendment 163-11523-00017, which changed the responsible official and replaced all water back booths with rotary finishing cells, was issued on November 29, 1999.
- (d) 1st Minor Source Modification 163-11437-00017, which approved construction of a second decorative chromium plating line and control devices, was issued on December 21, 1999.
- (e) 1st Significant Permit Modification 163-11558-00017, which approved operation of the equipment in Minor Source Modification 163-11437-00017, was issued on February 14, 2000.
- (f) 3rd Administrative Amendment 163-11681-00017, which clarified Administrative Amendment 163-11523-00017 to allow a gradual change from water back booths to rotary finishing cells, was issued on February 15, 2000.
- (g) 2nd Significant Source Modification 163-12662-00017, which approved construction of the robotic spray coating line identified as H20 and a regenerative thermal oxidation unit as VOC control, was issued on January 25, 2001.
- (h) 4th Administrative Amendment 163-14005-00017, which approved operation of the equipment in Significant Source Modification 163-12662-00017, was issued on December 27, 2001.
- (i) 1st Reopening 163-13502-00017, which changed permit language to comply with a judicial decision in an unrelated EPA court case, was issued on March 13, 2002.

- (j) 5th Administrative Amendment 163-15965-00017, which approves the addition of two etching tanks and one stripping tank as insignificant activities, was issued on August 28, 2002.

This application is the eleventh revision to the Part 70 permit. It seeks to add an acceptable version of language that was present in Significant Source Modification 163-12662-00017 but was intentionally removed by OAQ in Administrative Amendment 163-14005-00017. The original language created a scenario where Guardian Automotive Trim, Inc. could switch between two different compliance options at will, producing monitoring data that would be incomplete for either option and ineffective for determining overall compliance.

The following changes are being proposed for the Part 70 permit:

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(e)(d)] [40 CFR 52]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations) **40 CFR 52 Subpart P**, the particulate matter (PM) **emissions from overspray** the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly U14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the one (1) Department 13 hand spray coating line (U13-1), one (1) Department 13 air atomization hand spray coating line (U13-2), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly 20C-6B and 20C-7B), the one (1) Department 15 air atomization spray coating booth (U15-1), the one (1) Department 20 High Volume, Low Pressure paint spray booth (U20-12B) and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) shall be limited by the following:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control devices in accordance with manufacturer's specifications. The requirement to operate the control devices is not federally enforceable.

D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(e)(d), each particulate matter control device shall be in operation at all times when the emission unit that it controls is in operation. **The requirement to operate the control devices is not federally enforceable.**

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the **dry** filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the ~~surface coating booth~~ stacks **of surface coating booths using dry filters** (formerly 14-1B, 13-1A, 13-2A, 13-3A, 13-8B, 13-9B, 13-5B, 13-3B, 13-2B, 13-1B, 20-7B, 15-1B, 25S-1B and 25S-4B) while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (b) Monthly inspections shall be performed of the coating emissions from ~~the stack~~ **all other stacks** and the presence of overspray on the rooftops and the nearby ground.
- (c) 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.
- ~~(e)~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(e)(d)] [40 CFR 52]

- (a) Pursuant to ~~326 IAC 6-3-2 (Process Operations)~~ **40 CFR 52 Subpart P**, the particulate matter (PM) **emissions from overspray** ~~the one (1) Department 23 high gloss robotic spray coating booth (23-13B)~~ shall be limited by the following:

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

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

- (b) **Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.**

D.4.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(e)(d), the particulate matter control device shall be in operation at all times the ~~one (1) Department 23 high gloss robotic spray coating booth (23-13B)~~ is in operation. **The requirement to operate the control device is not federally enforceable.**

D.4.9 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (b) 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.
- ~~(b)~~(c) Additional inspections and preventive measures shall be performed as prescribed in the

Preventive Maintenance Plan.

D.5.1 Volatile Organic Compound (VOC) Limit [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the one (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20 shall be:

- (a) ~~The use at all times that the one (1) high gloss and low gloss robotic spray coating line is in operation~~ of a regenerative thermal oxidizer that maintains a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 90.0%. ~~When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature and fan speed in Hertz has been determined from the most recent compliant stack test, as approved by IDEM.~~
- (b) The VOC content delivered to the spray coating line H20 shall be limited to less than 228.88 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 22.89 tons per twelve (12) consecutive month period.

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications at all times when the robotic spray coating line is in operation. The requirement to operate the control devices is not federally enforceable.

[Conditions subsequent to D.5.4 were renumbered.]

~~D.5.7~~ D.5.8 Regenerative Thermal Oxidizer

- (a) In order to demonstrate compliance with D.5.1, the regenerative thermal oxidizer shall be operated at all times that the spray painting process is in operation, unless the regenerative thermal oxidizer cannot be operated due to an emergency as set forth in Condition B.13, Emergency Provisions. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1500 °F during operation until a temperature, **duct pressure** and fan speed in Hertz ~~has have~~ been determined from the most recent compliant stack test, as approved by IDEM. The **determined** temperature **and duct pressure shall correlate to a minimum** ~~correlates to an~~ overall VOC control efficiency of 90.0%.
- (b) With respect to Conditions B.13(b)(3) and (g)(1), "reasonable steps to minimize the level of emissions" may include, but are not limited to, actions to decrease the production output of the spray paint line or operation of the spray paint line as necessary to complete a production run initiated prior to the onset of the emergency.

- (c) With respect to Conditions B.13(b)(6) and (g)(1), "reasonable steps to correct the emergency" may include, but are not limited to, immediate efforts to restart the regenerative thermal oxidizer, or immediate efforts to examine the regenerative thermal oxidizer and identify, to the extent possible, the cause of the emergency.

~~D.5.8~~ **D.5.9** Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The fan speed in Hertz **and the duct pressure** shall be observed **together** at least once per week when the thermal oxidizer is in operation. This fan speed in Hertz shall be maintained **such that the duct pressure is** within the range, as established in most recent compliant stack test, to maintain a minimum 90.0% overall control efficiency (including capture and destruction efficiencies) of VOC emissions from the ~~one (1) high gloss and low gloss~~ robotic spray coating line.

D.5.10 Monitoring

- (a) **Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.**
- (b) **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.**

~~D.5.10~~ **D.5.11** Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.2, D.5.3 and ~~D.5.8~~ **D.5.9**, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits and/or the HAP emission limits ~~established in Conditions D.5.1, D.5.2, D.5.3 and D.5.8.~~
 - (1) The amount and VOC and HAP 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 cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period;

- (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
- (7) Weekly records of the fan speed in Hertz **and the duct pressure.**
- (b) **To document compliance with Condition D.5.10, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Furthermore, the facility description in Section D.5 is hereby amended as follows:

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

~~(22)~~(24) One (1) high gloss and low gloss robotic spray coating line, coating plastic parts, identified as H20, consisting of four (4) High Volume Low Pressure (HVLP) spray booths, each using water wash for Particulate Matter (PM) control, utilizing a regenerative thermal oxidizer as control and exhausting to stack RTOE. The regenerative thermal oxidizer has a heat input of 2 million British thermal units (mmBtu) per hour, and exhausts to stack RTOE.

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

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

Stack information will not be changed as a result of this revision.

Recommendation

The staff recommends to the Commissioner that the application be approved as a significant permit modification. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 26, 2003.

Emission Calculations

There are no emission calculations with this revision. Emissions are not expected to change.

Justification for Significant Permit Modification

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

Although this revision does not affect potential to emit, it involves significant changes to existing monitoring and record keeping requirements in the Part 70 permit. As a result, this change can neither be processed as an administrative amendment under 326 IAC 2-7-11 or a minor permit modification under 2-7-12(b). It must be processed as a significant permit modification under 326 IAC 2-7-12(d).

County Attainment Status

The source is located in Vanderburgh County.

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

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. Vanderburgh County has been designated as attainment or unclassifiable for ozone and for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

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

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

40 CFR 52 Subpart P (Indiana State Implementation Plan)

The paint overspray is subject to 40 CFR 52 Subpart P. Pursuant to 40 CFR 52 Subpart P, particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is classifiable as a major source under 326 IAC 2-2 (Prevention of Significant Deterioration). The VOC emissions from Significant Source Modification 163-12662-00017 are equal to 23.20 tons per year, after controls, which is less than PSD thresholds for VOC. The potential to emit every attainment pollutant will remain less than the PSD significant levels if the revision is approved. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997, this revision is not classified as a reconstruction under 40 CFR 63.41, and the revision does not by itself have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in one of the eight counties listed in the rule and it has the potential to emit more than ten (10) tons per year of volatile organic compounds or nitrogen oxides. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must 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 (Visible Emissions Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.
- (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.

326 IAC 6-1 (Nonattainment Area Limitations)

This source is not subject to 6-1 (Nonattainment Area Limitations), because:

- (a) the source is not specifically listed in 326 IAC 6-1-8.1 through 326 IAC 6-1-18;
- (b) the source does not have the potential to emit one hundred (100) tons or more of particulate matter per year; and
- (c) the source does not have actual emissions of ten (10) tons or more of particulate matter per year.

State Rule Applicability - Robotic Spray Coating Line H20

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

This facility is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, overspray shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications.

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

This rule requires that new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using Best Available Control Technology (BACT). The proposed robotic spray coating line H20 is not regulated by any other provisions of 326 IAC 8 and has potential uncontrolled VOC emissions of 228.9 tons per year. Pursuant to 326 IAC 8-1-6, the spray coating line H20 must utilize BACT to control VOC emissions.

- (a) The Permittee shall use a regenerative thermal oxidizer with overall control efficiency (including capture and destruction efficiencies) of no less than 90% to control the VOC emissions from spray coating line H20. OAQ has determined that a regenerative thermal oxidizer with an overall efficiency of no less than 90% is BACT for this coating operation.
- (b) The VOC content delivered to the spray coating line H20 shall be limited to less than 228.88 tons per twelve (12) consecutive month period.

State Rule Applicability - Other Spray Coating Booths and Lines

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

This rule has been amended since the issuance of the original Part 70 permit. All conditions addressing the original rule have been updated to reflect the requirements of the amended rule.

Conclusion

The operation of Robotic Spray Coating Line H20 shall be subject to the conditions of the attached Significant Permit Modification No. 163-17881-00017.